

Privacy Notice

25 March 2021

This privacy notice aims to give you information on how Sopra Steria collects and processes your personal data, including any data you may provide through this website, if you sign up to our newsletters, purchase a product or service, supply a product or service to us, or take part in an event or competition. This statement does not cover details relating to job applicants which can be found on our careers portal. This privacy notice is part of the ["Site Terms of Use"](#).

This website is not intended for children and we do not knowingly collect data relating to children.

This Privacy Notice should be considered alongside any other Privacy Notice or Fair Processing statements which we may provide relating to particular activities and is not intended to override them.

WHO WE ARE AND HOW TO CONTACT US

SITE PUBLISHER

This website is the property of Sopra Steria Group.

Legal Status

Sopra Steria Group
capital of 20,547,701 euros
registered at the Trade and Companies Register of Annecy under number 326 820 065

Registered Office

PAE Les Glaisins - 3 rue du Pré Faucon - Annecy Le Vieux - 74940 Annecy

Headquarters

6 avenue Kleber - FR 75116 Paris

Publication Director

Communications Director

Contact

Phone: +33 (0)1 40 67 29 29
contact-corp@soprasteria.com

Website Hosting Company

GTT Communications - 55 Avenue des Champs Pierreux - 92000 Nanterre
Phone: +33 (0)1 7749 7000
<https://www.gtt.net>

CONTROLLER

For the purpose of this notice the controller is Sopra Steria Limited in the UK, details of which are as set out below:

COMPANY NAME	CO REGISTERED NUMBER	ICO REGISTRATION	REGISTERED OFFICE	HOME PAGE URL
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Sopra Steria Limited	04077975	Z5873869	Three Cherry Trees Lane Hemel Hempstead HP2 7AH Herts Tel + 44 (0) 370 600 4466 info.uk@soprasteria.com	www.soprasteria.co.uk
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This privacy notice is issued by Sopra Steria Limited so when we mention "Company", "we", "us", "our" or "Sopra Steria" in this privacy notice, we are referring to Sopra Steria Limited .

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Our Data Protection Officer is Peter Cashmore Giles Brooks-Usher . His address is c/o Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead, HP2 7AH. His email address is dpo.uk@soprasteria.com.

The Supervisory Authority is the UK Information Commissioner www.ico.org.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Welcome to the Sopra Steria privacy notice.

Sopra Steria respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you [can download a pdf version of the notice](#). Please also use the Terms Used section to understand the meaning of some of the terms used in this privacy notice.

Every time you wish to use our site, please check this notice to ensure you understand the terms that apply at that time. Any changes to the policy since the publication date will be listed in section 12 of the notice.

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1. Purpose

The Company is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you, in accordance with data protection law, including the Data Protection Act 2018 and General Data Protection Regulation (GDPR).

The Company is the "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services, other than the [Site Terms of Use](#). This notice can be updated at any time and revised versions will be posted to the website.

2. Data Protection Principles

We will comply with the data protection principles set out in data protection law, including the Data Protection Act 2018 and General Data Protection Regulation (GDPR). These say that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about;
- kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which a living person can be identified. It does not include data where the identity has been removed (anonymous data).

As a Site User, supplier, client or prospect of Sopra Steria we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data includes** first name, last name, marital status, title, company name, Job Title/ Position.
- **Contact Data** includes work address, email address and telephone numbers, location/country.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and your interactions with marketing content.
- **Marketing and Communications Data** includes your preferences in receiving marketing materials from us and our third parties and your communications preferences.

We may also use your personal data to generate Aggregated Data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. Aggregated Data is not personal data in law as it is anonymised.

There are "Special Categories" of more sensitive personal data which require a higher level of protection (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We do not collect, store, or use Special Category information about you as a Site User, supplier, customer or prospect of Sopra Steria. Nor do we collect any information about criminal convictions and offences.

3.1 Maintaining Data Accuracy

It is important to us that the information we hold about you is accurate and current. Please keep us informed of any changes at info.uk@soprasteria.com.

4. How your personal information is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial and other data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - enquire about our products or services;
 - discuss the products or services that you may offer to us;
 - subscribe marketing communications or events;
 - attend events run or sponsored by Sopra Steria
 - enter a competition, promotion or survey; or
 - provide feedback.
- **Automated technologies or interactions.** As you interact with our website, we may collect automatically Technical Data about your equipment, browsing actions and patterns which might be used with other identifying data to establish other personal information about you. We collect this data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Technical Data from the following parties: analytics providers such as Google, Eloqua and social media channels such as Facebook, LinkedIn, Twitter, Instagram, YouTube; and
 - Identity and Contact Data from data brokers or aggregators where you have given consent.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

5. How we may use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- As a customer or prospect –to communicate with you about the services or products you may or have purchased
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override our legitimate interests (or those of the relevant third party).
- Where we need to comply with a legal or regulatory obligation.
- As a Supplier – to communicate with you regarding services or products that you have or may supply to us

6. Purposes for which we may use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications to you. You have the right to withdraw consent to marketing communications at any time by contacting us at info.uk@soprasteria.com.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To manage our relationship with you which will include: (a) Notifying you about changes to our terms (b) Asking you to give feedback	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To deliver relevant content to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications (f) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

6.1 Marketing

Where we do not currently have your consent to send you marketing communications, so are using legitimate interest to deliver content to you, we will seek your consent as part of these activities and provide you with the ability to opt out at any time.

If you would like to know about your marketing preferences please contact info.uk@soprasteria.com.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think may be of interest to your organisation.

6.2 Third-party marketing

We will not share your personal data with any company outside the Sopra Steria group of companies for marketing purposes without your permission.

6.3 Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time at info.uk@soprasteria.com.

6.4 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. You can find more information [here](#). If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

6.5 Change of purpose

We will only use your personal data for the purposes for which we collected it.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this notice, where this is required or permitted by law.

6.6 Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

7. Data sharing

We may in some circumstances have to share your data with third parties, including third-party service providers and other Sopra Steria Group entities. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may in some circumstances transfer your personal information outside the EU. Where this is needed we will ensure your rights are adequately protected through:

- Finding of adequacy (countries deemed by the European Commission to have adequate protections for personal data)
- Binding corporate rules
- Standard contractual clauses (Model Clauses)
- Or any other protection deemed adequate by the ICO.

7.1 Why might we share your personal information with third parties?

We will share your personal information with third parties where required by law. This may, in some circumstances, involve sharing special categories of personal data or, where relevant, data relating to criminal allegations.

We may also share your personal information with:

- **Professional advisers** including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- **Government Authorities** like HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- **Third parties** to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

7.2 Which third-party service providers process your personal information?

Some of our group systems are hosted by third parties who also process the data for the purposes set out in this Privacy Notice. These include Oracle, and our site hosting provider. Our site also contains cookies set by third parties, as set out in our [Cookie Policy](#).

7.3 How secure is your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

If a third party provider such as "Facebook" or "LinkedIn" uses your personal information for their own purposes, they do so as data controller, must inform you of what data they are using and the reasons why they using it, and possibly request your consent or that you contract with them directly.

7.4 When might we share your personal information with other organisations within the Sopra Steria Group?

Our group systems (including this website) are hosted in France, your personal information may be transmitted to, stored and processed in France. We may share your personal information with other Companies in the UK group or with wider Sopra Steria Group organisations for the purposes set out in 'Purposes for which we will use your personal data' above.

7.5 Transferring information outside the EU

We may transfer the personal information we collect about you to the following countries outside the EU

- India
- United States

There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- In respect of transfers of your personal data to Sopra Steria India; EEC Model Clauses which are deemed to provide an adequate level of protection under Commission Decision C 2010/593.
- In respect of transfers of your personal data to the United States; we transfer your personal information only to third parties who have signed up to Binding Corporate Rules or Standard Contractual Clauses (Model Clauses) or other safeguards deemed adequate by the ICO.

If you require further information about these protective measures, you can request it from Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or at dpo.uk@soprasteria.com.

8. Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Data retention

How long will we keep your information?

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

10. Legal Rights

Your rights in connection with personal information

You have the following legal rights in connection with your personal information:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of these rights, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH in writing, or email dpo.uk@soprasteria.com.

Please note that exemptions set out in the Data Protection Act 2018 may apply meaning that we do not have to grant your request in full. However, we will always meet your request as far as we are able.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we are allowed under the law to charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

What we may need from you

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If you do not provide such information in a timely manner, this may delay our response to your request.

11. Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at Data Protection Officer, The Company Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com.

12. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time. We will notify you from time to time about the processing of your personal information within our communications. Any material changes to the privacy are listed below.

- Reviewed December 2020 -Periodic review - Amended the data sharing approach with the US following a European Court of Justice inadequacy ruling on US Privacy Shield.
- Last reviewed March 2021 – Change in DPO to Giles Brooks-Usher.

13. Terms used

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

If you have any questions about this privacy notice, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com.

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