



## Registration to the Positive partner program

Effective version as of 17/04/2025

The data processing related to the "**Positive partner**" program registration is implemented by *Groupe Positive* in its capacity as data controller:

*Groupe Positive*  
3 Avenue Antoine Pinay  
ZA des 4 vents  
59510 Hem  
France



### Purpose of data processing

The purpose of the processing of the data collected by filling the form is to enable potential partners to contact the data controller, to be directed towards the most suitable partner program and to start a commercial relationship.

#### *Purposes*

The processing allows Groupe Positive to:

- Manage partnership requests,
- Assess needs based on the information provided,
- Determine the most suitable program,
- Communicate and provide personalized follow-up with contacts,
- Improve the services and offers provided,
- etc.

#### *Legal basis*

The legal basis for the processing is the users' consent, evidenced by the voluntary submission of the form.



### Processed data

#### *Categories of processed data*

- Identification data, personal or professional contact details (Email, Last name, First name, Phone number, Company)
- Partner-related details (Type, Client base size, Additional information)
- Connection data (IP address, logs, timestamps, etc.)

#### *Data source*

#### Groupe Positive

3 Avenue Antoine Pinay  
P.A. des Quatre Vents  
59510 Hem - FRANCE  
Tél : +33 (0) 328 328 000

SAS au capital de 7.427.173,90 €  
RCS Lille Métropole 919 289 108

Les personnes concernées saisissent leurs données d'identification au travers du formulaire, publiquement accessible. Les données de connexion sont collectées au travers de l'utilisation du formulaire (principe natif du web).

The data subjects enter their identification data through the publicly accessible form. Connection data is collected through the use of the form (native web principle).

### ***Mandatory nature of data collection***

The form requires the mandatory provision of first name, last name, email, phone number, and company in order to enable contact with registered individuals, while the type of partnership and the size of the client base and additional information are optional.

### ***Automated decision making***

This processing does not involve automatic decision-making.



### **Concerned persons**

The data processing concerns individuals who wish to become partners of Groupe Positive, who access the form and submit their personal data. However, since the form is publicly accessible, any person using the form may also be affected by the processing.

This may include:

- Resellers,
- Implementation partners,
- Service providers,
- System integrators,
- Affiliates,
- Utilisateurs du formulaire,
- etc.



### **Data recipients**

#### ***Categories of recipients***

According to their respective needs, the recipients of all or part of the data are:

- The staff of *Groupe Positive* and its subsidiaries, duly authorized
- Involved subprocessors



### **Data transfers outside the European Union**

Where transfers of personal data outside the European Union are made, *Groupe Positive* has ensured that they are made in accordance with the standard contractual clauses adopted by the European Commission or that other appropriate legal mechanisms are applied.

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## Data retention period

The data collected is retained for prospecting purposes for a maximum of 3 years after the last active contact.



## Security

*Groupe Positive* maintains security measures designed to protect the confidentiality, availability and integrity of data.

### Physical access control to premises and facilities

Measures to control physical access to premises and facilities (anti-intrusion system, video surveillance, controlled access zones, name badges, transponder and security locks, escorting of visitors, etc.).

### Access control to data and systems

User identification and authentication measures (shredders, differentiated rights assigned according to the principle of least privilege, employee entry/exit process with review, profiles with differentiated access and centralised administration, policy with authentication by strong passwords and use of safes, automatic locking on inactivity, encryption of portable disks and exchanged data, VPN, updates, antivirus, firewall limiting access to necessary ports and partitioning networks, traces, etc.).

### Availability control

Measures to ensure availability (back-ups, remote storage, business continuity plan, fire-fighting systems, electrical back-up, Internet back-up, air conditioning, maintenance plan, etc.)

### Internal measures and awareness-raising

Internal measures (confidentiality clause in contracts, regular training and awareness-raising, charter for the use of equipment appended to internal regulations, membership of the French Association of Data Protection Correspondents, etc.).



## Your rights to your data

In accordance with the applicable regulations, you may access and obtain a copy of the data concerning you. You also have the right to oppose, rectify, delete, limit and the right to draw up general or specific post-mortem directives concerning the conservation, deletion and communication of your personal data. On conditions, you may also have the right to object to the processing of your data, as well as the right to their portability.

To understand your rights, we invite you to consult the site of your control authority, in France, [the CNIL](#). Consult the list of control authorities on the [European Data Protection Board](#) (EDPB) website.



## Exercise your rights

You can contact the person in charge of data protection for any request to exercise your rights regarding the processing of your personal data. Please send your requests to the following address:

### Send your requests:

By email, at the following address:

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[dpo@positive-group.com](mailto:dpo@positive-group.com)

By post, to the attention of:  
Mr. the data protection officer  
*Groupe Positive*  
3 Avenue Antoine Pinay  
ZA des 4 vents  
59510 Hem  
France



### Complaint to the data protection authority

If, after contacting us, you believe that your rights to your personal data are not respected, you can submit a complaint to a data protection authority.

You will find more details on the procedure on the website of the authority of your place of residence, the place where the facts were observed.

Par exemple :

France	<a href="#">Commission Nationale de l'Informatique et des Libertés – CNIL</a>
Belgium	<a href="#">Commission de la protection de la vie privée – APD</a>
Spain	<a href="#">Agencia de Protección de Datos – AEPD</a>
Portugal	<a href="#">Comissão Nacional de Protecção de Dados – CNPD</a>
Germany	<a href="#">Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit – BfDI</a>

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Consult the list of control authorities on the site of the [European Data Protection Board](#) (EDPB)

[action Board](#) (EDPB)

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