

# ASSOCIATION DES PARENTS DE PARIS LA DEFENSE (APPLD)

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Code of Conduct

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## I. Editorial

The purpose of the APPLD is to represent and defend the interests of the students' parents of the Paris la Défense European School of Paris la Défense before the various local, regional, national and European authorities. It is to take and encourage any initiative that will allow the widest possible parents participation in the life of the school in all its forms and in the decisions relating to it.

It is to represent the educational interests of the pupils in the decision-making bodies of the European Schools and, in particular, of the School, as well as in local, regional, national and European authorities. The APPLD is to make known to the School authorities the wishes of the parents and their suggestions concerning the its organisation and management as well as to organise, in liaison with the School management, all extra-curricular activities, including after-school care, canteen services and lunch breaks.

It may also manage, where appropriate and at the discretion of the APPLD, the transport of pupils and establish direct collaboration with the parents' associations of other European schools. It is to ensure that parents are adequately informed of the decisions or deliberations of the various competent bodies concerning the school and promote social contacts between parents and other members of the school community, both in Courbevoie and in the other European schools, by organising all types of events.

Through this Code of Conduct, we wish to share our professional ethics and the way we approach our relationships with our members, providers and partners. More specifically, we would like to describe our commitment to data protection, especially of a personal nature.

The purpose of this Code of Conduct is to describe our commitments in the area of data protection, particularly of a personal nature. It expresses our compliance with the various French and European legislations on the protection of personal data.

This Code is addressed to all members of the Executive Committee (ExCom) as well as to any volunteers who have relations with APPLD. It is therefore freely available for internal consultation.

The ExCom undertakes to update the Code of Conduct each time a new Data Protection Officer (DPO) is appointed, and if not, every three years. The update of the Code will be validated by the DPO before any internal and external distribution.

## II. The applicable principles

We do everything possible to ensure that our various processes are in place to guarantee ongoing compliance. Regular evaluation of these processes is essential to maintain a high level of compliance.

All personal information that we collect is collected for a specific purpose. We assure you that we collect only the minimum amount of data necessary to fulfil that specific purpose and always in good faith and that only necessary data is processed.

As an example, the personal data we collect allows us to keep our member files up to date.

The personal data we collect are not intended to remain indefinitely in our information system. When the purpose for which it was collected has been achieved, we delete the data. Each piece of data has a retention period.

A repository created by the Data Protection Officer (DPO) indicates the retention periods for each data.

The use of personal data can never be authentic if the person concerned has not clearly understood why we need it. For this reason, each person is given clear and precise information about the purpose of the data collection.

We clearly inform each individual of his or her rights by means of a document included or transmitted at the beginning of each treatment.

The information necessary for the realization of certain projects can be transmitted to third parties in order to carry them out, but this done in the total respect of the rules presented here.

### III. Roles and Responsibilities

The **Data Controller** is the person in charge of the execution of a project and therefore the person who determines the purposes and means of the processing.

As such, the data controller ensures that he/she meets his/her obligations in an efficient manner. The **Data Protection Officer (DPO)**, whom he/she consults for each personal data processing project in order to ensure its protection from the project's conception, accompanies the data controller.

The members of ExCom provide the data controller and the DPO with support, particularly in implementing the technical and organizational measures necessary to ensure the security of personal data.

Because the satisfaction of our members depends on absolute trust.

We are all essential actors in the protection of personal data, we also commit ourselves to notify our members as soon as possible in case of a data breach or leak.

## IV. Data Management Process

### IV.1 MANDATORY INFORMATION

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In accordance with article 32 of the amended law of January 6, 1978, we inform you that the personal data collected are under the responsibility of our president Mr. Gabriel Mitrache in his capacity as leader of the association. The personal data that we collect can be intended for the realization of the internal procedures (management of the membership, management of the payments of service...) but also related to the realization of our services such as the audits, the tests of intrusion and the audits of conformity with the personal data legislation.

The recipients of your personal data can be the secretary general, a project manager within ComEx or the DPO.

In accordance with the French Data Protection Act, you have the right to access, modify and object to your personal data for legitimate reasons. To exercise one of these rights, you can send your request to our DPO at [dpo@appld-ee.eu](mailto:dpo@appld-ee.eu). Our DPO undertakes to reply as quickly as possible, within a maximum of two months. Without a response from us, you can then submit your request to the CNIL.

### IV.2 PROCESSING OF REQUESTS FROM PERSONS CONCERNED (EXERCISE OF THEIR RIGHTS)

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The serenity of our relationship with our members is essential. To do this, we do everything possible to inform our members of requests related to personal data. The European regulation reinforces and grants rights to the persons concerned.

We have decided to anticipate these requests by providing our members with a complete sheet explaining and reiterating their rights as well as the procedure to follow for any complaint or request.

### IV.3 DATA PRIVACY IMPACT ASSESSMENT

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Personal data can be extremely diverse, all of which must be protected according to their level of criticality. To this end, the DPO conducts Data Privacy Impact Assessments (DPIA) on the most risky operations.

A working group led by the DPO will draw up a list of eight questions; these questions will help determine whether the processing requires an impact assessment. The first round of assessments will begin no later than February 1, 2021.

When the outcome of the questionnaire is positive, a complete analysis of the risks to the privacy of individuals is carried out by the DPO with the help of the operational staff concerned. The analysis is based in particular on the legal texts and the recommendations of the CNIL in terms of purpose, proportionality of processing, relevance of data, retention period and information to individuals.

If the processing is determined too risky for privacy, we shall cancel its implementation or develop an action plan with advanced technical security measures (anonymization, encryption ...).

The APPLD is committed to ensuring that the privacy of its members is protected as much as possible. In this sense, privacy protection is considered and evaluated at the design and inception stage of a project.

Regular compliance reviews are conducted to assure our members and partners of our high level of data protection.

Impact assessments are conducted annually under the direction of the DPO.

#### IV.4 CNIL AUDITS

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Although we make every effort to ensure a high level of compliance with legal obligations, we are not exempt from a CNIL audit. Thus, our DPO keeps a clear and up-to-date register of processing operations, which he can easily transmit to the CNIL experts.

#### IV.5 DATA BREACH AND SECURITY LEAKS

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We make every effort to maintain an excellent level of protection for our data systems. However, because perfect security does not exist, we are exposed to security breach threats. Therefore, in the event of a data breach, the DPO and the President have developed a specific breach management procedure.

First, the ExCom acts as quickly as possible to determine the cause and nature of the breach. They inform the DPO as soon as the breach is detected. The DPO, together with Comex, can establish a corrective action plan.

A data breach requires urgent, precise and rigorous action.

#### IV.6 SUBCONTRACTING MANAGEMENT

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In the event that personal data is processed by a subcontractor on behalf of APPLD, we will make every effort to ensure that the subcontractor provides sufficient guarantees for the protection of personal data.

A procedure for managing subcontracting has therefore been set up, according to the following guidelines.

First, the DPO systematically verifies that the contract proposed by the subcontractor meets the requirements of the GDPR. The contract must stipulate the nature and purpose of the processing, the object and duration of the data storage, as well as the type of personal data and the categories of data subjects.

Finally, the contract must provide for documentation and traceability; the security measures the processor implements, cooperation with authorities, assistance in handling requests from individuals in exercising their rights, notification of security breaches, the processor's recourse to another sub-processor, and the fate of the data at the end of the contract.



Gabriel Mittrache, President



Albert Lahoud, DPO