

INTRODUCTION AND DEFINITIONS

Altran Solutions Corp (“Altran” or “the Company”) adheres to the Safe Harbor Privacy Principles concerning the transfer of personal data from the European Union (EU) and Switzerland to the United States of America. We recognize that the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce generally restricts the transfer of personally identifiable information about individuals in the EU and Switzerland to the United States, unless there is adequate protection for such information when it is received in the United States. Accordingly, Altran follows the Safe Harbor Principles published by the U.S. Department of Commerce (“Principles”) with respect to all such data. This statement outlines our general policy and practices for implementing the Principles, including the types of personal data the Company gathers, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, the personal data relating to them. If there is any conflict between this Statement and the Principles, the Principles will govern.

This policy applies to all personal data and sensitive personal data we handle, including online (except as noted below), offline and manually processed data. For purposes of this Statement, “personal data” means information that:

- Is transferred from the EU to the United States
- Is about, or pertains to, a specific individual
- Can be linked to that individual

and “sensitive personal data” means personal data that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sex life.

ALTRAN AND ITS AFFILIATES

Altran Solutions Corp. is a United States based corporation, which is owned by a French parent, who operates numerous international affiliates. Altran may share some or all of its personal data with these or future affiliates. Altran requires all affiliates to honor its Privacy Policies, including the Safe Harbor Privacy Policy. In the event of a change in ownership, or a direct merger or acquisition with another entity, Altran reserves the right to transfer all of Altran User Information, including Personal Data, to a separate entity. Altran will use commercially reasonable efforts to notify individuals of any change or ownership, merger or acquisition of Altran by a third party, and the individual may choose to modify any of his/her registration information at that time.

PRINCIPLES PROTECTING INDIVIDUALS PRIVACY: NOTICE, CHOICE & TRANSFER

Where Altran collects personal information directly from individuals in the EU and Switzerland, it will inform them about the purpose for which it collects and uses personal information about them and the

choices and means, if any, Altran offers individuals for limiting the use and disclosure of their personal information.

We notify individuals about the personal data we collect from them, how we use it and how to contact us with privacy concerns. We provide such notice through this Statement, our engagement letters or other similar documents and direct communication with individuals from whom we collect personal data. Altran collects and process personal data about its personnel for the purpose of human resources administration and recruitment. We collect and process personal data about our clients and their personnel for the purpose of rendering professional services to our clients.

We collect personal data from individuals only as permitted by the Principles. Consent for personal data to be collected, used and/or disclosed in certain ways (including opt in consent for sensitive data) may be required in order for an individual to obtain or use our services. Such consent is provided through our engagement letters or other similar documents, as well as through employment agreements or other similar documents.

We obtain written assurances from any third party agents we use in connection with our business to safeguard the personal data and sensitive personal data protected under this Agreement that it may obtain from Altran before such information is disclosed to such third party agents.

Data, Security, Integrity, and Access

Altran employs various physical, electronic and managerial measures, including education and training of our personnel, designed to provide personal information with reasonable protection from loss, misuse or unauthorized access, disclosure, alteration or destruction. Personal data collected or displayed through our website is protected in transit by our security processes. However, we cannot guaranty the security of information on or transmitted via the Internet.

Altran will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Altran will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current. Altran will only collect and store personal information that is relevant to fulfill the purpose of the request and will retain such information no longer than appropriate to fulfill the purpose of the request.

Upon request, Altran will grant individuals reasonable access to personal information that it holds about them. In addition, Altran will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

If an individual becomes aware that information we maintain about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact us using the contact information below. The individual will need to provide sufficient identifying information, such as name, address, birth date, and Social Security number.

We may request additional identifying information as a security precaution. In addition, we may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Principles.

Accountability and Enforcement

Altran has put in place mechanisms to verify our ongoing adherence to these privacy principles. We encourage individuals covered by this Policy to raise any concerns that they have about the way that Altran processes their personal data by contacting us at the address below, and the Company will do its best to resolve them.

Individuals may file a complaint with us in connection with our processing of their personal data under the Safe Harbor Principles. With respect to any dispute relating to this policy that cannot be resolved through our internal processes:

- If the dispute involves data collected in the context of an employment relationship, we will cooperate with competent EU data protection authorities and comply with the advice of such authorities. In the event that Altran or such authorities determine that Altran did not comply with this policy, the Company will take appropriate steps to address any adverse effects and to promote future compliance
- If the dispute involves other types of data, individuals may pursue the matter by filing a claim with the appropriate agency.
- Personnel who violate our privacy policies will be subject to disciplinary process.

Altran has agreed to participate in the dispute resolution procedures of the American Arbitration Association pursuant to the Safe Harbor Principles.

Amendment

Altran may amend this policy from time to time consistent with the Principles of the Safe Harbor Agreement by posting a revised policy on this website that replaces any former policies.

Information subject to other policies

Altran is committed to following the Principles for all personal data within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of the Company that may differ in some

respects from the general policies set forth in this Statement. Certain Altran affiliate websites have their own privacy policies that apply to those websites.

Information relating to present or former Altran personnel is subject to its policies concerning personnel data privacy.

Information obtained from or relating to clients or former clients is further subject to the terms of any privacy notice to the client, any engagement letter or letters with the client, and applicable laws and professional standards. Adherence by Altran to these privacy principles may be limited to the extent required to meet a legal, governmental, national security or public interest obligation. To learn more about the Safe Harbor Program, and to view Altran's certification, please visit: <http://www.export.gov/safeharbor/>.

Contact information

Questions or comments regarding this Policy should be submitted to the Altran by mail as follows:

Altran Solutions Corp
Attn: General Counsel
451 D. Street
Boston, MA 02110
Tel: (617) 204-1011 ext. 16245
www.altran.com

Changes to this safe harbor privacy policy

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. A notice will be posted on the Altran web page (www.Altran-na.com) for 60 days whenever this Safe Harbor Privacy Policy is changed in a material way.

Effective date

October 10, 2014