



# ALERTCYS

## Algorithm use policy

<b>1. General conditions</b>	<b>3</b>
1.1. Object	3
1.2 Champ d'application	3
1.3. Purposes of algorithms	3



1.4. Limitation of the use of algorithms	3
1.5. Preliminary authorisation	3
<b>2. Action on algorithms</b>	<b>4</b>
2.1. Algorithm control	4
2.2. Editing Algorithms	4
2.3. Creating an algorithm	4
<b>3. Summary of the actions carried out by our algorithm</b>	<b>5</b>
<b>4. Form relating to algorithms</b>	<b>8</b>
<b>Algorithm information form</b>	<b>9</b>
<b>Algorithm evolution form</b>	<b>10</b>



## **1. Terms and conditions**

### **1.1. Object**

This document determines the purposes of the use of the algorithms used by Concord for its Alertcys.io service, as well as the regime applicable to these algorithms and their use.

### **1.2. Scope**

This document applies to all algorithms used by Concord.

The binding provisions and commitments mentioned in this document apply to all Concord agents using algorithms as part of their function or having the power to control or modify the algorithms.

### **1.3. Purposes of algorithms**

The purpose of the algorithms used by Concord is to facilitate the implementation of the processes established by Concord decision-makers by accelerating and automating the mandatory steps in the context of each file submitted to the Alertcys.io service.

### **1.4. Limitation of the use of algorithms**

The use of algorithms is excluded when their implementation would result in an infringement of the principle of data minimization or present a risk to the right to privacy of users of the Alertcys.io service.

### **1.5. Preliminary authorisation**

The use of algorithms is subject to both the authorization of users and confirmation by them of their understanding of how the algorithms work. In the absence of one of these two elements the user cannot access the service, the absence of the use of algorithms making the provision of the service impossible.

## **2. Action on algorithms**



## 2.1. Algorithm control

The algorithms are subject to control prior to the commissioning of any new version by an authorized agent. This control aims to control:

- The integrity of the database: the use of the algorithm must not cause alteration or destruction of the processed data.
- The absence of algorithmic bias: the use of the algorithm must not create discrimination of any kind in the context of processing.
- The loyalty of the algorithm: the use of the algorithm must not result in unnecessary processing, while respecting the principle of data minimization, and the processing carried out must be carried out accurately.

Each of the checks, as well as the measures adopted accordingly, must be registered by the agent who carried them out in the register of the operation of the algorithms.

## 2.2. Editing Algorithms

The algorithm may be subject to modification by authorized agents in the following circumstances:

- Implementation of measures deemed necessary following monthly checks;
- Compliance with legal obligations;
- By express order of the data controller or his representative.

Modifying an algorithm outside of these circumstances constitutes serious misconduct given the potential harm that such a modification may cause to the rights and freedoms of users.

If the modification of an algorithm causes the information provided to persons whose data is processed by the algorithm at the time of filing the file to become obsolete, this information is updated as quickly as possible. Substantial modifications are communicated to the persons concerned. Their express consent is necessary to continue processing the file.

## 2.3 Creating an algorithm

The implementation of a new algorithm in the context of data processing can only be done on the explicit and written instruction of the president of Concord which must include the following elements:

- The exact purpose of the algorithm;
- The data that will be processed by the algorithm;
- The designation of the person responsible for creating the algorithm;
- Description of the means made available for creating the algorithm.



The implementation of a new algorithm without having first obtained this agreement constitutes a serious error in view of the potential harm that such a creation can cause to the rights and freedoms of users.

If the creation of an algorithm causes the information provided to persons whose data is processed by the algorithm at the time of filing the file to become obsolete, this information is updated as quickly as possible. Data subjects are informed of the creation of this new algorithm. Their express consent is necessary to continue processing the file.

### **3. Summary of the actions carried out by our algorithm**

As part of the processing of alert files, Concord relies on an IT tool to assist and improve your information.

The sole purpose of this tool is to facilitate the implementation of the processes established by Concord by assisting it with repetitive actions or by improving the information made available as part of each file submitted on the Alertcys site.

Algorithmic processes are involved in the following stages of the mediation process:

- When receiving the alert and creating the file.
  - Use of the information provided by the whistleblower when creating his account to fill in his contact details fields, which he can always freely modify.
  - Initial placement of the file in the “Waiting for submission” category.
  - Move of the file from the “Waiting for submission” category to the “submitted” category upon submission by the whistleblower.
  - If the applicant has communicated his email address to Concord, sending an email to the applicant confirming the submission of his file.
- When assigning the request to the mediator
  - Insertion in the file of the contact details of the mediator (Last name, First name, Telephone number, Email address, Address, Postal code, City) designated by the managers.
  - Move of the file from the “submitted” category to the “initiated” category upon acceptance by managers.
  - Sending an email to the whistleblower informing him of the acceptance of his file by the mediator.
- When assigning the request to the referrer:
  - Sending an email to the referent, informing him of the filing of an alert which he is responsible for processing.
- When processing the alert
  - Sending an email to the whistleblower informing them of the acceptance of the alert by the referent.



- Sending an email to the parties and the mediator when adding a message to the forum, on the condition that they have access to the forum.
- Sending an email to the parties when a document is added to the alert processing file.
- Move of the file to the “Alert being processed” category upon acceptance of the file by a party.
- When closing the file.
  - Sending an email to the parties informing them of the closure of the file.

Algorithmic processes do not make any decisions or propose solutions, and only implement the decisions of Concord's human stakeholders.

Algorithmic processes do not collect any data. In fact, only the information provided by the Parties to mediation and that collected by Concord managers is used within the framework of these algorithmic processes.

The mediators intervene within the framework of the alert during discussions with the parties within the framework of the forum specific to each file. The mediators write the findings themselves

At any time a party may contact Concord to request that operations relating to these files are not subject to partially algorithmic processing. This request may be refused by Concord if it proves technically impossible to implement or entails disproportionate effort or cost. This request must be sent to Concord using the form below.

The algorithms are all subject to a monthly check to verify their proper functioning, the absence of discriminatory nature in the processing carried out and the conservation of the data.

## **4. Algorithms form**

Users have the option of sending Concord one of the following forms:

- Information form relating to algorithms allowing the user to send Concord a request relating to their use of algorithms in the context of mediation.
- PDF form for opposition to the evolution of algorithms allowing the user to object to the continuation of mediation following the evolution of one of the algorithms used by Concord.



# Algorithm information form

## Subject of the form

This form allows you to send Concord a request relating to its use of algorithms in the context of mediation

this form must be sent to Concord either by email or by post to the following contact details:

Mail : [contact@alertcys.io](mailto:contact@alertcys.io)      Address :      Concord  
73 Boulevard de Clichy  
75009 Paris

## User details

First name and last name/Company name:

\_\_\_\_\_

Address : \_\_\_\_\_

Phone : \_\_\_\_\_

Mail address : \_\_\_\_\_

## Request addressed to Concord

- I would like to request human intervention instead of using algorithms  
To specify :  
\_\_\_\_\_
- I would like to obtain communication of the technical instructions for the algorithm
- I would like to receive explanations on how the algorithm works



# Algorithm evolution form

## Subject of the form

This form allows you to contact Concords in order to confirm the continuation of mediation or to oppose it following the evolution of one of the algorithms used by Concord.

This form must be sent to Concord either by email or by post to the following contact details:

Mail : [contact@alertcys.io](mailto:contact@alertcys.io)      Address :      Concord  
73 Boulevard de Clichy  
75009 Paris

It is necessary for your request to be granted that a scan of your identity card or any element proving your identity be communicated, attached to this form.

## Authorization to process the data provided in the form

- I give my consent to the processing of the data provided on this form for the purposes of verifying my identity, studying my request and responding to this same request.
  
- I confirm that I have read and understood the Alertcys data protection policy.

## Information about the data subject

First name and last name/Company name:

\_\_\_\_\_

Address : \_\_\_\_\_

Mail address : \_\_\_\_\_

## Statement of objection

- I consent to the mediation file concerning me and the data it contains being processed in accordance with the evolution of the algorithm
  
- I refuse that the mediation file concerning me and the data it contains be processed in accordance with the evolution of the algorithm. I am aware that my refusal will result in the impossibility of continuing to process my file and its closure.

Made in \_\_\_\_\_

The \_\_\_\_\_