

Personal data protection policy for users of VEDECOM' website

When using (hereafter the « Users ») the web site <u>www.vedecom.fr</u> and the services accessible on it, VEDECOM Institute, as controller, is likely to collect and treat personal data which concern you.

Indeed, in connection with the use of the site, you are likely to provide us with your personal data by filling out, for example, a collection form, when you subscribe to a newsletter or when you ask to receive one of our catalogue of training offers, when you submit an application form on the page dedicated to recruitment, when you contact VEDECOM Institute or when you transmit your personal data to us in any other way.

To protect your privacy, all the processing of personal data carried out using the website of the VEDECOM Institute comply with the applicable regulations on the protection of personal data, and in particular the provisions of the Data Protection Act of January 6th, 1978, as amended, and of the General Data Protection Regulation (EU Regulation 2016/679) (more commonly known as the "GDPR")

Below we explain which personal data about you are processed, the reasons for the implementation of these processing, and how your personal data are used by the VEDECOM Institute.

Principles implemented in the execution of processing

The regulations on the protection of personal data require that, for each processing of personal data carried out, principles to ensure the protection of privacy and personal data are implemented. In this regard, the VEDECOM Institute undertakes to respect the following principles for all the processing that we implement and that concern you:

- Lawfulness of processing: Users' personal data are processed lawfully, fairly and transparently;
- Purpose of processing: The personal data of Users are collected for specific, explicit and legitimate purposes, and are not subsequently processed in a manner incompatible with those purposes;
- Minimization of processing: The Users' personal data are stored in an adequate, relevant manner and are limited to what is necessary for the purposes for which they are processed;
- Data accuracy: the personal data of the Users processed must be accurate and kept up to date. To the extent possible to ensure this accuracy, inaccurate data shall be erased or corrected as soon as possible;
- Security of processing: The personal data of Users must be processed in a way that ensures their security in relation to the risk associated with these processing. In this sense, appropriate technical (including IT) and organizational security measures are deployed by the VEDECOM Institute;
- "Privacy by default » and « Privacy by design": the processing implemented by the VEDECOM Institute are designed to protect the data of the concerned persons from their creation and are implemented throughout their existence to maintain this privacy requirement.

The same level of requirement is requested by the VEDECOM Institute for its processors (service providers and subcontractors) who would participate in the processing of Users' personal data on behalf of the VEDECOM Institute, in particular, for personal data that could be hosted on third party servers.



Purposes and legal basis of processing

The purpose of the processing carried out by the VEDECOM Institute is, in particular, and without this list being exhaustive, to make Users benefit from the services accessible on the website www.vedecom.fr, to allow navigation on our website, to contract the Users to send them our newsletters, our offers of training, recruitment, to answer to the Users questions.

Generally speaking, such processing of Users' personal data shall be carried out on the basis of their consent, the information to be provided to Users as to the processing being either indicated on this web page, or directly on the web page where consent is requested.

As regards to the processing of data relating to minors, the processing of a person's personal data based on consent is lawful, as a matter of principle, only if that person is at least 16 years old. Below this age, parental permission is necessary for the consent of the minor to be validly constituted.

If personal data concerning minors under 16 years old are collected via the website, parents or holders of the exercise of parental authority have the opportunity objecting by contacting us at the address indicated at the bottom of this page.

The processing can also be carried out for the legitimate interests of the VEDECOM Institute, in particular, enabling us to develop and improve new services, detect, to deal with or prevent fraudulent activities, abuses, security breaches or any technical problems.

Storage life

The personal data of Users shall be retained for a period not exceeding that necessary for the purposes for which they are processed, in accordance, where appropriate, with the retention periods imposed by the applicable laws in force.

Recipients of personal data

The personal data collected on the website of the VEDECOM Institute, are likely to be communicated to the authorized staff of the VEDECOM Institute, its partners, its processors (service providers or sub-contractors) according to the purpose of each processing.

Some of the above-mentioned recipients may be established outside the European Union and may have access to all or part of the personal data collected. Within the framework of these transfers outside the European Union, the VEDECOM Institute undertakes to guarantee the protection of your data in accordance with the rules defined by the Regulations on personal data in force, in particular, the rules relating to data transfers in a country not considered by the European Commission to ensure an adequate level of protection.

Rights of persons concerned by the processing of personal data

In accordance with the applicable regulations on the protection of personal data, each User may at any time exercise his rights of opposition, limitation, access, rectification, deletion of data and portability of personal data concerning it.

These rights are exercised by sending an e-mail at privacy@vedecom.fr.

The requests must be accompanied by all the necessary elements for its processing by the VEDECOM Institute and will also include all the necessary elements for the identification (name, first name, email) of the User.

For certain specific services, these rights may be exercised directly online or through use of a unsubscribe service (management of your user account, management of your newsletters subscriptions, etc...).

You also have the right to appeal to the National Commission for Information Technology and





Freedoms (CNIL) in the event of a violation of the applicable regulations on the protection of personal data.

Hyperlinks and cookies

The website www.vedecom.fr contains several hyperlinks to other sites, set up with the permission of the VEDECOM Institute. However, VEDECOM does not have the possibility to check the content of the sites visited and will therefore assume no responsibility for this fact. Users are invited to refer to the terms of use and the data protection (or privacy) policy for each of these third-party sites.

Browsing the site www.vedecom.fr is likely to cause the installation of cookies on the User's computer. A cookie is a small file, which does not allow user identification, but records information about the navigation of a computer on a site. The data thus obtained are intended to facilitate subsequent navigation on the site and are also intended to allow various measures of attendance.

The processing of personal data carried out by the installation and use of a cookie is based on the User's consent, a request for authorization to use cookies being requested for each new User (or when the User's machine no longer has cookies linked to the website www.vedecom.fr, for example following the deletion of cookies).