

PRIVACY POLICY

PREAMBLE

This Privacy Policy is binding for ICS PARIS (hereinafter "School", "we", "us", "our"). It applies to the processing of personal data (hereinafter "Personal Data") that we carry out on our website <https://www.icsparis.fr>, hereinafter referred to as "Site".

For ease of reading our Privacy Policy, capitalized terms such as "Personal Data", "Customer", "User", "Services" refer to the definitions in section 2 of this Privacy Policy.

The School offers this Site mainly for the private use of its customers and of any person wishing to obtain information, to know about, to subscribe to and/or to purchase the products and/or services it offers for sale. The Users of the site have the possibility of benefiting via our Site from our Services as defined in article 2 of the present.

As part of these Services, we are required to collect and process certain Personal Data about you in compliance with the French law n°78-17 of 6th January 1978 and the European Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data 2016/279 of 27th April 2016 ("GDPR"). We have established this Policy (hereinafter the "Privacy Policy") which, in a transparent approach, aims to inform you about:

- **how the School collects and processes your Personal Information**
- **the commitments made by the School to ensure the security of your Personal Data**
- **the rights you have over the Personal Data processed by the School**
- **the School's obligations but also your own, with a view to maximising the protection of your data**

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The ICS PARIS company belongs to the GLOBEDUCATE group (NACE France) which is a simplified joint stock company (Société à associé unique) with a capital of 41 825 000,00 €, whose registered office is located 76 rue Saint Lazare 75009 Paris, registered with the Companies Register of Paris, under the number 539 045 617, email address : questions@icsparis.fr, phone number: +33 (0)1 56 56 60 70.

We process your Personal Data as a Data Controller, as defined in Article 2 below. This also means that we give specific instructions to our possible subcontractors, who may process your Personal Data on our behalf and in order to operate the Services from which you benefit.

2. DEFINITIONS

For the purpose of this document, the terms defined below beginning with capital letters and used in both the singular and the plural shall have the following meaning:

"Customer": any individual or legal entity that uses the Site.

"Customer Account": personal connection space made available to a Customer on the Site to follow up on his/her registration. This Account is strictly personal, individual, non-assignable and non-transferable to a third party. The Account is accessible via the Customer's login and password.

"Personal Data or Data": "any information relating to an identified or identifiable individual (hereinafter referred to as "data subject"); an "identifiable individual" is deemed to be an individual who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity" according to Article 4 of the European Regulation on the protection of personal data.

"Product(s)": products offered for sale by the School on its Site or its brochures and/or paper catalogues.

"Controller" means the School which, alone or jointly with others, determines the purposes and means of the processing it carries out on your Personal Data.

"Service(s)": This refers to all the services offered to Clients by the School.

"Site": this is the website published by the School, presented under the name of the School.

"User": This refers to any individual accessing the Site, on their own behalf or on behalf of a legal entity, and having the capacity to use the Site's services, whether as a visitor or as a Client.

3. WHY DO WE COLLECT PERSONAL DATA?

The data we collect directly from you is used in the following ways.

The main processing of your Personal Data is as follows:

Online process	What data do we collect?
Management of purchases of products and/or services and registrations made on the Site, in-person at the School or remotely (by telephone or email).	Civility, surname, first name, postal address, email address, telephone number (landline and/or mobile), fax number, date of birth, payment information (bank account number, credit card number, BIC), purchase data and history, login and password for access to your personal account, login and pseudonym on social networks, language preference
Commercial and direct marketing management: promotional and commercial operations, sending newsletters and brochures, information on our offers and products and services, sending offers from partner schools	Civility, surname, first name, postal address, email address, date of birth, telephone number (landline and/or mobile), fax number, purchase history (quantity, amount, delivery address), purchasing habits, preferred products and services, preferred language.

For the administration of our Site	Data related to your terminal and your connection, in particular: IP address, internet connection, type of browser, information concerning the terminal used, duration of the connection, referring URL, information on the pages visited on our site during your visit.
Information requests and customer complaints	Civility, surname, first name, postal address, telephone number (fixed and/or mobile), fax number, email addresses, date of birth, service subscribed to, purchase history, quantity, amount, correspondence with the customer and any information necessary for us to respond to your complaints and/or requests for information

If you have activated geolocation on your browser when you log in, we may be able to locate your connection, in order to improve the performance of our Service and in order to adapt the content of our products and services, for example by selecting a Globeducate Group School close to your location. Geolocation can be deactivated at any time on your browser.

- Data collected by third parties via cookies:

When you connect to an internet server, a certain amount of data is sent to the browser and stored on your device's hard drive. The files that collect this information are called "cookies".

When you first connect to the site you will be informed about cookies by the appearance of a banner. This will explain:

- the precise purposes of the cookies used by our Site
- the possibility to set, accept or refuse these cookies

In the context of the use of cookies and similar technologies, we are likely to process personal data about you, as the controller, for the purposes defined in our Cookie Policy, which we invite you to read via the following link: <https://www.icsparis.fr/cookies-policy>

Cookies and other third-party trackers are dependent on external processors, who may, if you accept these cookies, also process personal data about you.

The issue and use of these cookies and similar technologies by third parties are subject to their own privacy policies. For more information about these treatments, you can refer to their own particular privacy policy and their cookies policy.

List of partners likely to deposit Cookies on the Site: <https://www.icsparis.fr/cookies-policy>

The data collected is essential to achieve the objectives pursued by each cookie or tracker. It is only intended for the authorised departments of the School and/or the company issuing the cookies and other third-party trackers.

Personal data collected via cookies and similar technologies are never kept longer than necessary to achieve the purpose of the cookie or tracker and, in any case, never longer than 13 months.

For more information on cookies and their use, please read our Cookie Policy.

- Data collected by third parties via links to third party sites and applications

We may include on our Site, applications from third parties, which allow you to share the content of our Site with other people or to let these other people know your views or opinions concerning the content of our Site. This is notably the case of the "Share" and "Like" buttons from social networks such as Facebook, Twitter, Instagram, LinkedIn, etc.

These social networks may collect data relating to your browsing on our Site and associated with the personal data they hold.

We do not manage the data collected by these third parties. We invite you to consult the privacy policies of these social networks in order to learn about the purposes for which they may use the browsing information they may collect through these applications. These protection policies must allow you to exercise your choices with these social networks, in particular by setting up your accounts for each of these networks.

To find out the privacy policy of the above-mentioned social networks, click on the name of the social network of your choice:

Facebook: <https://www.facebook.com/policies/cookies>

Twitter: <https://twitter.com/en/privacy>

Instagram: <https://help.instagram.com/519522125107875>

LinkedIn : <https://www.linkedin.com/legal/privacy-policy>

4. WHY DO WE COLLECT DATA AND WHAT IS THE LEGAL BASIS?

We may process your Personal Data on several legal grounds, among those listed in Article 6 of the GDPR:

- ❖ On the legal basis of the contract concluded with you following a purchase made on our Site or registration made with the School, via the Site or directly within the School:

On this basis we undertake the following data handling tasks:

- the management of your purchases, orders and/or registrations made on the Site or directly at the School, as well as their execution
- managing our relationship with you, as users of the Site, including but not limited to:
 - the creation of a personal account on the Site
 - the use of the Site and the services it offers
 - managing communications and tracking exchanges with you

❖ On the legal basis of your consent;

On this basis we undertake the following data handling tasks:

- sending communications about promotions and offers, whether personalized or not, by mail or electronically, including mobile notifications
- sending commercial and/or marketing communications on any medium such as the Site;
- the management of cookies (subject to consent)
- transmission of personal data to other schools in the Globeducate Group to which the School belongs

❖ On the basis of the legitimate interest of the School

On this basis we undertake the following data handling tasks:

- to manage your requests for information in order to improve your user experience and our customer approach
- using the information you provide in your online account to customize the Services and products we offer you
- to provide you with personalized recommendations and offers from other Globeducate Group schools
- to send you a newsletter, brochure, or catalogue to the email address you have given
- the management and administration of the Site

❖ On the basis of our legal and regulatory obligations

On this basis we undertake the following data handling tasks:

- the retrieval of information about you in order to respond to your requests to exercise your rights (article 5)
- the management of our general accounts
- the management of responses to official requests from public or judicial authorities empowered to do so
- compliance with the regulations applicable to our activity

- the retention of invoices and other mandatory documents relating to transactions in accordance with our obligations

5. WHAT ARE YOUR RIGHTS?

In accordance with the provisions of the GDPR and the Data Protection Act, you have, as a person concerned by the processing of Personal Data, a right of access, rectification, modification, deletion, limitation, opposition and portability, on the Personal Data that we collect and process.

You also have the right to lodge a complaint with the relevant supervisory authority (in France, the Commission Nationale de l'Informatique et des Libertés, or "CNIL").

For any information relating to the protection of Personal Data, you can consult the site of the CNIL by clicking on the following link: <https://www.cnil.fr>

Where the processing of Personal Data by us is based on your consent, you may withdraw that consent at any time, without prejudice to the lawfulness of the processing carried out prior to its withdrawal.

You may exercise these rights at any time and free of charge, subject to the limit of manifestly unfounded or excessive requests (in particular because of their repetitive nature). In this exceptional case, we reserve the right, in accordance with the GDPR, to require payment of a reasonable fee (indexed to the administrative costs of your request) or to refuse your request.

These rights can be exercised by sending an email explaining the purpose of your request to the personal data protection officer whose contact details are as follows:

RGPD.france@globeducate.fr

Rights at your disposal	Your rights explained
Right of access	<p>The right to know whether we hold Personal Data about you and to obtain a copy of it, together with, in particular, the following information:</p> <ul style="list-style-type: none"> - the reason for processing, the categories of Personal Data processed, the categories of recipients of the data, the period of retention where possible (or the criteria used to determine that period), the rights you have.

<p>Right to erasure (the right to be forgotten)</p>	<p>The right to obtain the deletion of your Personal Data in the cases provided for by the GDPR, in particular:</p> <ul style="list-style-type: none"> - when the data we process is no longer necessary for us; when you object to commercial prospecting and request deletion in addition to the cessation of processing; when the processing is unlawful.
<p>Right to object</p> <p>Right to object to direct marketing</p>	<p>This right applies where we process your data in order to pursue one of our legitimate interests. If you request to object, we will analyse the reasons relating to your particular situation and investigate whether we have a legitimate and compelling reason to continue processing your data. If not, we will cease the processing concerned.</p> <p>If you object to direct marketing, we will cease the processing of your data altogether.</p>
<p>Right to limit processing</p>	<p>You may request that the processing be suspended, with the exception of the retention of Personal Data when:</p> <ul style="list-style-type: none"> - you dispute the accuracy of the data (this limitation is obtained during the time of our verification of this possible inaccuracy) - the processing is unlawful and you prefer to limit the processing rather than erase the data - we no longer need the data but you consider that they are still necessary for the establishment, exercise or defence of legal claims - you have made a request to object due to your particular circumstances and this restriction is obtained during the time it takes to check the balance of interests between our legitimate interests and your rights and freedoms <p>Where processing has been restricted, personal data may only be processed with your consent or for the exercise, establishment and defence of legal claims.</p>
<p>The right to data portability</p>	<p>You have the right to receive the Personal</p>

	<p>Data you have directly provided to us in a structured, commonly used and machine-readable format.</p> <p>You also have the right to pass on this data or to request that we pass it on to another controller.</p> <p>This right only applies to processing based on the consent of the individual, or on the performance of the contract and which is carried out by means of an automated process.</p>
--	--

The fate of data in the event of death

In accordance with the provisions of the Data Protection Act, we inform you that, as an individual:

- you have the right to provide us with instructions regarding the retention, deletion and disclosure of your Personal Information after your death
- you can change or revoke these instructions with us at any time
- you may designate a person to carry out these instructions, who will have the authority after your death to review the instructions and to request that we carry them out

You are also informed that in the absence of specific instructions from the School as to what should happen to your Personal Information, your heirs may exercise after your death the rights relating to the retention, deletion and disclosure of your Personal Information to the extent necessary to organise and settle your estate and for the School to take account of your death.

6. RETENTION PERIOD OF YOUR PERSONAL DATA

The Personal Data collected are kept for the time necessary to achieve the purposes as described in Article 3, above, plus the duration of legal requirements, if any.

The shelf life of data:

Purposes of data processing	Shelf life
Managing login data and cookies	13 months from the date of consent given by the User to the deposit of the Cookie
<ul style="list-style-type: none"> • Management of your purchases, 	3 years from the last incoming contact, i.e. if

<p>orders and/or registrations on the Site or directly at the School, and their execution</p> <ul style="list-style-type: none"> ● Management of communications and follow-up of exchanges with Clients 	<p>after a period of 3 years there has been:</p> <ul style="list-style-type: none"> - no connection or modification of your personal account - no purchase, order, registration via the Site or directly at the School
<p>Creating a personal account on the Site</p>	<p>Until the account is terminated or after 3 years from the last login or modification of the account</p>
<ul style="list-style-type: none"> ● Sending communications about personalised or non-personalised offers by post or electronic means, including mobile notifications ● Sending commercial and/or marketing communications through any medium such as the Site ● Using the information you enter in your personal online account to personalise the Services and Products we offer you; <ul style="list-style-type: none"> ○ to provide you with personalised promotions and recommendations from us and from other Globeducate Group schools and/or our partners ○ to send you a newsletter, brochure or catalogue to the email address you have provided 	<p>Until the consent is withdrawn or 3 years from the collection of the data or the last incoming contact with the data subject, i.e. if after a period of 3 years there has been:</p> <ul style="list-style-type: none"> - no connection or modification of your personal account - no purchase via the Site or the Application
<p>Transfer of personal data to other Globeducate Group schools</p>	<p>3 years from the date the personal data is transferred to other Globeducate Group schools</p>
<p>Handling your requests to exercise your rights (Article 4)</p>	<p>1 year for the rights of access, rectification, erasure and restriction of processing</p> <p>6 years for exercising the right to object to processing</p>
<ul style="list-style-type: none"> ● Managing our general accounts ● Retention of invoices and other mandatory documents relating to transactions in accordance with our obligations. 	<p>10 years from the end of the current financial year</p>

Management of responses to official requests from public or judicial authorities empowered to do so	3 years from last incoming contact

The Personal Data collected is deleted upon the occurrence of any of the following events (and subject to compliance with applicable legal requirements and legal retention periods):

- at the end of the retention period, as defined above
- when you exercise your right to be forgotten in accordance with the French Data Protection Act and the terms and conditions specified in Article 4 of this Personal Data Policy

Unless you specifically direct us to do so (provided that such specific direction is reasonable and practicable for us), we will delete all of your Personal Data, in the event of your death, at the end of the applicable retention period and applicable requirements, upon request of a successor in interest and upon proof of successor in interest and of your death and in accordance with Section 5.

7. TRANSMISSION OF YOUR PERSONAL DATA

The Personal Data we collect may be transmitted:

- to all authorized School personnel
- to technical service providers for the purposes described in Article 3, and in particular the service providers in charge of:
 - the execution of Services, their management and processing
 - the security of the Site
 - payment processing and security measures for the transmission of payment data
 - the sending of prospecting emails, invitations to register and any other information email
- to the other schools of the Globeducate Group to which the School belongs

To this end, and in accordance with Article 26 of the GDPR, the School and the Globeducate Group establish an intra-group data sharing agreement between them, which sets out in a transparent manner their respective obligations for the purpose of ensuring compliance with the requirements of the GDPR, in particular with regard to the exercise of the rights of the data subject, and their respective obligations with regard to the communication of the information referred to in Articles 13 and 14 of the GDPR. This agreement mentions in particular the identity and contact details of the institutions concerned by this sharing. This agreement can be accessed upon request to the following email address: rgpd.france@globeducate.fr but is also sent to families when they apply for enrolment in one of the Group's establishments. You expressly acknowledge that you have read this agreement and agree that your personal data

collected by the School may be shared between the Globeducate Group establishments for the purposes set out and defined in the above-mentioned data sharing agreement.

- to social networks, including Facebook. We invite you to consult Facebook's privacy policy to learn about the collection and processing of your Data by Facebook.
- You agree that we may also be required to disclose information about you in order to comply with Applicable Regulations or to respond to any judicial or administrative request.

If you do not want your Personal Data to be transmitted, you can exercise your rights as described in article 4.

8. SECURING YOUR PERSONAL DATA

We implement appropriate technical and administrative measures to protect your Personal Data against accidental or illicit destruction, accidental loss, alteration, distribution or unauthorised access to such data. However, we do not control all the risks associated with the operation of the internet and draw your attention to the existence of possible risks inherent in its operation.

We also monitor how our service providers process your Personal Data to ensure that they provide sufficient guarantees that appropriate data security measures are in place.

In the event that you identify a security vulnerability affecting the Site, you agree to provide us with relevant information about the vulnerability on a confidential basis.

9. MODIFICATIONS

This Privacy Policy may be updated from time to time and will be posted online. The previous Privacy Policy will then be replaced by the new version which will be immediately enforceable. Use of the Site is subject to the Privacy Policy in effect at the time of use.

In order to stay informed of any such changes and updates, you are advised to review the Privacy Policy regularly. The School may, but is not obliged to, provide information about updates by posting a message on the Site.