

PRIVACY POLICY

The Cours de civilisation française de la Sorbonne, hereinafter referred to as CCFS, are committed to protecting your personal data and privacy. Personal data refers to information that directly or indirectly identifies an individual (name, registration number, telephone number, photograph, date of birth, city of residence, etc.).

I – PURPOSE

This Privacy Policy aims to describe the type of personal data we, the CCFS, collect or receive, how we use, share, and protect them, how we use cookies and similar technologies, and your rights and choices.

II – TYPES OF DATA COLLECTED

1) PERSONAL DATA PROVIDED BY YOU

The personal data we collect are either:

- Personal data you voluntarily provide;
 - Personal data we request when you:
 - Contact us by email, phone, mail, or any other means;
 - Request a quote, assistance, downloads, or information;
 - Purchase a course or service;
 - Create or manage a student account;
 - Register or activate a device (PC, mobile phone, or smartphone);
 - Register for events, webinars, or services;
 - Subscribe to newsletters, event alerts, or information;
 - Participate in surveys, contests, or other promotional activities.
- The type of personal data we may ask for includes, but is not limited to:
- Your civil status;
 - Your contact details (e.g., your physical address, email address, phone number...);
 - Your professional data (e.g., your job title);
 - Your identification information (e.g., your username);
 - Your financial data (e.g., your credit or payment card number, bank account number, billing address);
 - Etc.

We may ask you for additional personal data, for example, in our online surveys to understand your needs. In this case, you will be informed at the time of collection.

2) PERSONAL DATA COLLECTED AUTOMATICALLY

In addition to the personal data you provide, our websites automatically collect the domain names of all visitors, and we also use third-party web analytics services that may collect information such as your IP address, the type of device you use, your device ID, and other technical information through cookies and similar tracking technologies. In some countries, including those in the European Economic Area, some information may be considered personal data under applicable data protection laws.

Collecting personal data allows us to better understand the type of visitors who visit our sites, where they come from, and what content interests them on our sites. We use this information for internal analysis and to improve the quality and relevance of our sites for visitors. Some of this information may be collected using cookies and similar tracking technologies. For more information, please see our Cookie Policy available on the relevant websites.

3) PERSONAL DATA COLLECTED FROM THIRD PARTIES

Occasionally, we may receive personal data about you from third-party sources, but only when these third parties are authorized or required to disclose your personal data to us. The information we may collect from third parties includes your contact details, possible professional data, data related to your educational background, etc.

III – PURPOSES OF COLLECTION

We use the personal data we collect from you only for the purposes described in this Privacy Policy, for compatible purposes, or for the purposes we have explained to you at the time of collecting your personal data.

In particular, we use your information to:

- Provide the training and services you request, comply with the terms of our agreements with you, and manage our business relationship; specifically, to manage our candidates and prospects, manage your registration and schooling, handle your request for documentation and information about our courses, etc.;
- Activate, register, or update the services you have purchased from us (e.g., access to a PC, mobile phone, smartphone, access to an online teaching module, access to a digital library...);

- Send important notifications about our terms, registration conditions, privacy policies...;
- Conduct our activities, evaluate and improve our schools (including developing new courses; optimizing and improving our services; analyzing our courses/services;
- Respond to requirements imposed by administrative and financial controls and audits;
- Perform accounting, auditing, reconciliation, and invoice collection functions, and other internal business functions;
- Conduct data analysis and processing (including market and consumer studies, satisfaction studies, trend analysis, financial analysis);
- Protect you and our staff from fraud and other illegal activities or unfounded accusations; establish, exercise, and defend your rights and those of our staff, and comply with our legal and regulatory obligations in force;
- Maintain the physical security of our premises (e.g., visitor logs) and computer or electronic security;
- Inform you of upcoming events, updates, new courses/services, and other offers in accordance with your communication preferences;
- Operate and manage our websites.

We may also use your personal data in an aggregated form that does not allow individual identification to evaluate and improve our training and service offerings.

IV – LEGAL BASIS FOR PROCESSING PERSONAL DATA

For the European Economic Area, our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific purposes for which we collect and request them. The relevant legal basis for processing is indicated in the information provided to you when collecting your personal data. However, we collect personal data from you only when:

- you have given us your prior express consent;
- we need your personal data to provide a service (e.g., cookies strictly necessary for navigating our websites, documentation request), to execute a contract or agreement with you;
- when processing is necessary to protect our legitimate interests while preserving your interests and your fundamental rights and freedoms in terms of personal data protection.

In some cases, we may be required by law to collect personal data from you, or we may need your personal data to protect your own interests or those of a third party. For any questions regarding the legal basis on which we rely to collect and use your personal information, please contact us using the details provided in Article XI "Contact".

V – PROCESSING OF PERSONAL DATA

1) RECIPIENTS OF PERSONAL DATA

Based on the above, we may disclose your personal data to the following recipients:

- All subsidiaries of the Cours de civilisation française de la Sorbonne and more generally the Robert de Sorbon Foundation to which the CCFS belongs;
- Subcontractors and/or partners of the CCFS and the Robert de Sorbon Foundation, who provide us with services involving data processing or who otherwise process personal information for the purposes described in this Privacy Policy or for the purposes notified to you when we collect your personal data;
- Any competent law enforcement agency, government agency, regulatory body, court, or other third parties to whom it is necessary to disclose personal information (i) under applicable laws or regulations, (ii) to exercise, establish, or defend our rights, or (iii) to protect your interests or those of a third party;
- Any third-party company that has made a proposal to purchase, merge, reorganize, acquire, dissolve, or liquidate all or part of the Cours de civilisation française de la Sorbonne, provided that we inform the interested third party that it must use your personal data only for the purposes provided in this Privacy Policy;
- Any partner organization located in a country outside the EU, particularly in the context of internships abroad or international exchanges of our students, subject to compliance with the provisions of Article IX;
- Any other person to whom you have authorized us to disclose your personal data.

2) YOUR RIGHTS

Under the European General Data Protection Regulation No. 2016/679 ("GDPR"), you have the right:

- to access certain personal data we hold about you and to obtain a copy of these data;
- to update or correct inaccuracies in these data;
- to object to our use of your personal data;

- to request the deletion of your personal data from our database;
 - to object to the processing of your personal data by us;
 - to ask us to restrict the processing of your personal data;
 - to request the portability of your personal data.
- You also have the right to refuse at any time to receive the marketing communications we send you. You can exercise this right by clicking on the unsubscribe links in the marketing emails we send you. Similarly, if we have collected and processed your personal data with your consent, you can withdraw your consent at any time. Please note that withdrawing your consent will not affect the legality of the processing we have carried out before your withdrawal, nor will it affect the processing of your personal data carried out on a legal basis other than consent.

To exercise all your rights, please contact:

Cours de civilisation française de la Sorbonne – DPO Service – 16-22 rue de Martignac – 75007 PARIS

We will consider your request in accordance with applicable data protection laws and regulations. To protect your privacy and ensure the security of your data, we may verify your identity before granting you any access to personal data concerning you. If you consider our processing of your personal data contrary to current legislation or your rights and freedoms, you have the right to file a complaint with your local personal data protection authority.

VI – PERSONAL DATA SECURITY

Given that the disclosure of personal data over the Internet cannot be entirely secure to date, we cannot guarantee total control over the risks associated with the operation of the Internet and their consequences on your personal data, as these data are deposited at your own risk.

However, we attach great importance to the protection of your personal data and your privacy. That is why we have implemented the necessary technical and organizational measures (physical, logical, and human security) to protect your personal data against destruction, loss, alteration, access, disclosure, and accidental, illegal, or unauthorized use.

VII – RETENTION OF PERSONAL DATA

1) LEGAL BASIS

We retain your personal data when we have a legitimate and ongoing need, such as to provide you with a service, to allow you access and follow-up of a training course, or to comply with legal, tax, or accounting obligations.

When we have no legitimate business need to process your personal data, we delete them, anonymize them, or, if this is not possible, for instance, because your personal data are stored in backup archives, we securely store your personal data.

2) RETENTION PERIOD

We strive to comply with the data retention periods indicated below:

Documents and data related to the commercial relationship with the client

Data related to commercial prospecting:

- Planned retention period by CNIL (unless contrary legal provision): 3 years from the end of the relationship or the last contact. Examples of last contact: request for documentation, click on a hyperlink contained in an email. Note: opening an email cannot be considered as a contact
- Legal references: CNIL Decision No. 2016-264 of July 21, 2016 (NS-048): N/A in education – reasoning by analogy
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 3 years from the last contact Processing for information and communication without prospecting:
- Planned retention period by CNIL (unless contrary legal provision): Duration necessary for the realization of the defined purposes with annual data update
- Legal references: CNIL Decision No. 2006-138 of May 9, 2006 (DI-007)
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 3 years from the last contact Data related to student management:
- Planned retention period by CNIL (unless contrary legal provision): During the duration necessary for the management of the relationship (analogy with customer files)
- Legal references: CNIL Decision No. 2016-264 of July 21, 2016 (NS-048): N/A in education – reasoning by analogy
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 2 to 50 years depending on the type of data Contract and guarantees concluded with a student/learner:

- Legal retention period: 2 years
- Legal references: Article L. 218-2 of the Consumer Code
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 2 years Contract and guarantees concluded electronically with a consumer (for an amount equal to or greater than 120 €):
- Legal retention period: 10 years
- Legal references: Article L. 213-1 of the Consumer Code Article D. 213-1 of the Consumer Code Article D. 213-2 of the Consumer Code
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 10 years Customer invoices:
- Legal retention period: 10 years from the closing of the accounting period
- Legal references: Article L. 123-22 of the Commercial Code
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 10 years

Documents related to the rights and freedoms of the concerned individuals

Identity documents for requests related to the access and rectification rights of the concerned individual:

- Legal retention period: 1 year
- Planned retention period by CNIL (unless contrary legal provision): 1 year
- Legal references: Article 9 of the Code of Criminal Procedure CNIL Decision No. 2016-264 of July 21, 2016 (NS-048)
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 1 year Identity documents for requests related to the opposition right of the concerned individual
- Legal retention period: 6 years (archiving only)
- Planned retention period by CNIL (unless contrary legal provision): 3 years (archiving only)
- Legal references: Article 8 of the Code of Criminal Procedure CNIL Decision No. 2016-264 of July 21, 2016 (NS-048)
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 3 years from the last contact Connection data on the Digital Work Environment (ENT)
- Planned retention period by CNIL (unless contrary legal provision): Until the student's request for deletion with explicit annual agreement request when the student has left the school
- Legal references: Decree of November 30, 2006 (RU-03) – currently being amended
- Retention period implemented by the Cours de civilisation française de la Sorbonne: 6 months after graduation or abandonment of training Log files/Journal files
- Planned retention period by CNIL (unless contrary legal provision): 6 months
- Legal references: CNIL Guides – 2008 Edition – Personal Data Security
- Retention period implemented by the Cours de civilisation française de la Sorbonne: Maximum 3 years

VIII – HYPERLINKS

Our websites and educational platforms may contain links to third-party websites. We are not responsible for the content or privacy practices employed by these websites.

IX – INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data may be transferred and processed in countries other than the country of your educational institution. These countries may have data protection laws different from those of your country and, in some cases, may not be as protective.

However, we have taken appropriate precautions to require that your personal data remain protected in accordance with this Privacy Policy. When we transfer your personal data to other countries, we rely on:

- The adequacy decisions of the European Commission, which recognize that certain countries outside the EEA have national laws protecting personal data according to standards substantially similar to those required by European Union law;
- The European Commission's Standard Contractual Clauses, which require recipients outside the EEA of personal data to continue to protect the personal data they receive according to the standards required by European Union law;
- Other legal mechanisms for data transfer or legal exemptions to restrictions on data transfer.

You can obtain more details by making your request to:

Cours de civilisation française de la Sorbonne – DPO Service – 16-22 rue de Martignac – 75007 PARIS

X – UPDATES

We may update this Privacy Policy to comply with legislative, regulatory, technical, or commercial developments. When we update our Privacy Policy, we will take appropriate measures to inform you, depending on the significance of the changes we make. We will inform you of any significant changes to the Privacy Policy if and when required by the applicable legislative and regulatory texts.

You can see the date on which this Privacy Policy was last updated by checking the date indicated at the top of this Privacy Policy.

XI – CONTACT

For any questions regarding the Privacy Policy, you can contact us at the following address:

Cours de civilisation française de la Sorbonne – Service du DPO – 16-22 rue de Martignac – 75007 PARIS

COOKIE POLICIES INFORMATION ABOUT COOKIES

WHAT IS A COOKIE?

Cookies are small files that are installed on your computer or device for a limited duration when you visit our websites.

PURPOSE OF COOKIES

We use cookies to make your visits and registration on our sites more efficient and secure. Cookies also allow us to improve navigation on our sites and understand your browsing preferences.

OUR USE OF COOKIES

We use cookies to:

- Remember your login information.
- Identify you when you log in to our websites.
- Gather information that can help us send you advertisements tailored to your interests.
- Remember your browsing preferences such as your language, font size, page layout, or favorite colors. All this to allow you to navigate our site more quickly and easily.
- Collect analytical information to, for example, count the number of visitors to our websites and identify the pages of our sites that you visit most often. We use the analytical data we collect for marketing purposes and resource planning.
- Determine if our visitors easily adapt to changes we may make to our websites.

INFORMATION COLLECTED THROUGH COOKIES

Cookies help us collect information about how you use our website, but we do not store any information that personally identifies you in our cookie data about you. We only record a unique session identifier that will help us find a user profile and your preferences on your next visit.

TYPES OF COOKIES

- Session Cookies – These cookies are temporarily stored on your computer or device during a browsing session. They are erased from your computer or device at the end of the browsing session.
- Permanent Cookies – These cookies remain on your computer for a longer period. Permanent cookies help us recognize you when we need to know who you are for more than one browsing session.

These cookies can be divided into several categories:

- Essential navigation cookies (technical cookies)
These cookies are essential to allow you to browse our website and make the best use of its various features. These cookies are exclusively deposited by the Cours de civilisation française de la Sorbonne.
- Functionality cookies
These cookies are essential for your navigation as they allow optimizing the operation of our site and giving you access to specific features. They also allow you to adapt the graphical rendering of the site to the display preferences of your terminal. These cookies thus allow you to have a smooth and customized navigation.
- Statistical cookies

These are cookies that allow us to know the performance of our site, to establish statistics of attendance and use of the various elements of our site (content visited, journey). These cookies allow us to improve the interest and usability of our services (the pages or sections most often consulted, the most-read articles, ...). Cookies

also help us count visitors to a page and detect any operational anomalies on the site.

- Advertising cookies
These are cookies used to present you with offers and information tailored to your interests during your Internet browsing. Refusing these cookies does not affect the use of our site. However, refusing advertising cookies will not stop advertising during your browsing. It will only result in displaying advertisements that do not take into account your interests or preferences.

• Social network cookies

Our site includes elements from third parties (application buttons), which allow the Internet user to share specific content via social networks. This is particularly the case with the "Share," "Like," "g+1," "Tweet" buttons from social networks such as "Facebook," "Google+," "Twitter," etc. If you interact using elements from third parties, for example, by clicking on the "Like" button or leaving a comment, the corresponding information will be transmitted to the social network and published on your profile. If you do not want the social network to link the information collected through our site to your user account, you must first log out of the social network. We invite you to consult the privacy protection policies of these social networks to learn about the purposes of use, particularly advertising, of the browsing information they can collect through these application buttons.

Cookie Publishers: ATL Software AEC

Type of Cookies: Cookies de session

<https://atl-software.net/conditions-generales/>

Cookie Publishers: Plezi

Type of Cookies: Cookies publicitaires

<https://www.plezi.co/fr/mentions-legales/>

Cookie Publishers: Google Adwords, Doubleclick, Youtube

Type of Cookies: Cookies publicitaires

<https://policies.google.com/privacy?hl=fr-CA>

Cookie Publishers: Facebook Ads

Type of Cookies: Cookies publicitaires

<https://fr-fr.facebook.com/privacy/explanation>

Cookie Publishers: Google Analytics

Type of Cookies: Cookies statistiques

<https://policies.google.com/privacy?hl=fr>

MANAGING COOKIES

In accordance with regulations, you have the right to object to and access data concerning you. Therefore, you can object to the placement of some of our cookies by using the appropriate settings in your browser. The menu of most browsers includes options to manage your cookies by adjusting or configuring your cookie settings.

Typically, the browser allows you to:

- View your cookies;
- Allow cookies;
- Disable all cookies, or only specific cookies;
- Disable all cookies when you close your browser;
- Block cookies;
- Be informed when you receive a cookie.

Please note that if you choose to block our cookies, some of the features of our websites will be disabled (including services such as online registration, management, or customization of the site) and your browsing may also be affected. If you set the options in your browser to delete all cookies, your browsing preferences will be erased when you close your browser. Please note that unless you have set your browser settings to refuse cookies, our system will issue cookies as soon as you visit one of our sites.

Users can disable the use of these cookies by setting their Internet browser. You can set your browser to refuse or delete certain cookies. The following links show how to adjust cookies depending on the browser used:

- Internet Explorer
- Firefox
- Safari
- Google Chrome

DURATION OF YOUR COOKIES

In accordance with CNIL recommendations, the validity period for consent to the placement of Cookies on our sites is set at a maximum of 13 months after their first deposit on your equipment and is not extended by new visits to the site. After this period, your consent will need to be collected again.

So 13 months is the maximum lifespan of a cookie.

ADDITIONAL INFORMATION ON COOKIES

For more information about cookies, we invite you to visit the following page:

<https://www.cnil.fr/fr/cookies-traceurs-que-dit-la-loi>

List of cookies

A cookie is a small data file (text file) that a website, when visited by a user, asks your browser to store on your device to remember information about you, such as your language preferences or login information. We set these cookies called internal cookies. We also use third-party cookies, which are cookies from a domain different from the website you are visiting, for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be disabled in our systems. They are usually set in response to actions you have taken that constitute a request for services, such as setting your privacy preferences, logging in, or filling out forms. You can set your browser to block or be informed of the existence of these cookies, but some parts of the website may be affected. These cookies do not store any personally identifiable information.

Performance Cookies

These cookies allow us to determine the number of visits and traffic sources, to measure and improve the performance of our website. They also help us identify the most/least visited pages and evaluate how visitors navigate the website. All information collected by these cookies is aggregated and therefore anonymized. If you do not accept these cookies, we will not be informed of your visit to our site.

Targeted Advertising Cookies

These cookies may be set within our website by our advertising partners. They may be used by these companies to build a profile of your interests and offer you relevant advertisements on other websites. They do not store personal data directly, but are based on the unique identification of your browser and Internet device. If you do not allow these cookies, your advertising will be less targeted.

Store and/or access information on a device

Cookies, device identifiers, or other information can be stored or accessed on your device for the purposes presented to you.

Ads and personalized content, ad and content performance measurement, audience insights, and product development

Ads and content can be personalized based on a profile. Additional data can be added to better personalize ads and content. Ad and content performance can be measured. Insights about audiences who saw the ads and content can be generated. Data can be used to build or improve user experience, systems, and software.

- Select standard ads: Ads may be shown to you based on the content you are viewing, the app you are using, your approximate location, or your device type.
- Create a personalized ad profile: A profile can be built about you and your interests to show you personalized ads that are relevant to you.
- Select personalized ads: Personalized ads can be shown to you based on a profile about you.
- Create a profile to display personalized content: A profile can be built about you and your interests to show you personalized content that is relevant to you.
- Select personalized content: Personalized content can be shown to you based on your user profile.
- Measure ad performance: The performance and effectiveness of ads that you see or interact with can be measured.
- Measure content performance: The performance and effectiveness of content that you see or interact with can be measured.
- Conduct market research to generate audience insights: Market research can be used to learn more about the audiences who visit sites/apps and view ads.
- Develop and improve products: Your data can be used to improve existing systems and software, and to develop new products.

Use precise geolocation data

Your precise geolocation data can be used in support of one or more purposes. This means your location can be accurate to within several meters.

Actively scan device characteristics for identification

Your device can be identified based on a scan of your device's unique combination of characteristics.

Ensure security, prevent fraud, and debug

Your data can be used to monitor for and prevent fraudulent activity, and ensure systems and processes work properly and securely.

Technically deliver ads or content

Your device can receive and send information that allows you to see and interact with ads and content.

Match and combine offline data sources

Data from offline data sources can be combined with your online activity in support of one or more purposes.

Link different devices

Different devices can be determined as belonging to you or your household in support of one or more purposes.

Receive and use automatically-sent device characteristics for identification

Your device might be distinguished from other devices based on information it automatically sends, such as IP address or browser type.