



**PRIVACY POLICY**

*Version of June 2018*

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## INTRODUCTION

EDHEC takes the protection of personal data seriously and pledges to manage the data that it collects on you in a secure and responsible fashion. We are committed to protecting and respecting your private life.

Personal data must be processed in a lawful, faithful and transparent manner. EDHEC is also responsible for providing you with clear and accessible information regarding the way in which we use the data we collect on you or you transmit to us.

When you use EDHEC's website or you enter into contact with us, we collect or you provide us with certain elements of data concerning your person.

This confidentiality policy sets out the principles governing the way in which we process this data and also explains how you can access and update this data and make certain choices regarding the way in which your personal data is used.

We are liable to update this policy from time to time and to publish the new version on our website. This version is dated 05/06/2018.

### 1. WHAT DATA DO WE COLLECT AND HOW?

When using our website or EDHEC services, you are called upon to transmit us certain elements of data concerning your person, some of which are liable to identify you ("personal data"). This is notably the case when you browse our website, fill in online forms, participate in our events or, more generally, enrol/register at EDHEC.

The type and quantity of the data collected varies according to your relationship with EDHEC:

- **Your name and personal details:** this category comprises all data enabling us to contact you, e.g. your family name, first name(s), e-mail address, telephone number.
- **Data needed for your enrolment/registration:** this type of data may consist of a copy of your ID card or passport, your student number, your social security number, your level on the bursary scale, a photo, etc.
- **Data relating to your studies:** your academic and professional record and history, data shown on your CV, all of your grade sheets and other data accumulated during your studies at EDHEC.
- **Login IDs:** all data needed for you to access your personal IT account, such as your password and other data needed for authentication and account access purposes.
- **Demographic data:** all data describing your demographic or behavioural characteristics. These items may concern your birthdate, gender, geographic location, etc.
- **Data relating to your browsing:** when you use our websites you interact with them. We collect certain data items relating to your activity on our websites.

- **Detail on your financial or accounting operations:** this category notably concerns data processed in relation to the payment of enrolment/registration fees, such as bank account ID code, account number and account-holder name, etc.

## 2. WHY AND HOW DO WE USE YOUR DATA?

We are liable to use your personal data for the following purposes:

- **To execute our contract with you.** Whether you are an EDHEC student, partner or staff member, we process your data for administrative and account management purposes and to manage your relationship with us.
- **To track and manage your studies at EDHEC.** EDHEC collects and processes certain data items concerning your person in order to compile your enrolment/registration file, organise tuition and exams, track your studies and internships, offer you career assistance, etc.
- **To provide you with information on our programmes.** When you request brochures online, we use your data to contact you and send you the information requested.
- **To provide you with a service or assistance.** EDHEC provides different services such as the assessment of your profile in order to determine your admissibility for a programme. To respond to these requests, we may, for example, collect data relating to your academic and professional history and record.
- **For marketing operations.** With your consent, we may be called upon to use your personal data in order to send you correspondence relating to our activities, in accordance with the interest expressed by you. This correspondence may comprise newsletters, invitations to events, editions of our magazine OTHERWISE, etc. They may be sent via electronic messaging services or third-party social networks. You may ask us at any moment to cease contacting you for marketing purposes by writing to: [DPO@edhec.edu](mailto:DPO@edhec.edu)
- **To offer you alumni association services.** On joining EDHEC, you benefit from all the services offered by the alumni association of former graduates. Your data is used by the association and its volunteer ambassadors to run the alumni network, assist you in building your career plans, help you in promoting your career or compile alumni directories.
- **Resolve legal matters.** We may be called upon to process your personal data so as to comply with requests for information or to defend your rights in relation to legal proceedings.
- **For statistical and quality monitoring purposes.** In order to improve the quality of our services and the School's performances in general, we are liable to analyse your personal data or to submit you surveys for the purposes of compiling statistics or overall reports.

### 3. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

We share your personal data with your consent or when necessary with third parties:

- **Our contractors.** We may call upon contractors to provide technical services, for example. Our contractors must comply with our demands relating to data confidentiality and security. They are not authorised to use the personal data they receive from us for other purposes.
- **With banks or payment firms and organisations** that provide financial services.
- **With legal authorities.** To comply with legal obligations, we may be required to share certain aspects of your data with legal or regulatory authorities.
- **With the Education Ministry.** In relation to the delivery of accreditations, EDHEC may be called upon to transfer your data to France's Ministry of Higher Education and Research.

### 4. ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA?

EDHEC only collects, uses and shares your personal data in accordance with prevailing regulations. We may process your data:

- **Because you have given us your consent.** For certain operations such as marketing operations, we use your data because you have authorised us to do so.
- **To execute your contract with us.** Whether you are an EDHEC student, partner or staff member, we process your data for the purposes of executing our contract with you and to provide you with the intended services.
- **To comply with a legal obligation.** In certain cases, we need to collect or retain certain items of data concerning you, so as to comply with our own legal obligations, in terms of taxation or security, for example.
- **Because such processing is in our legitimate interest.** On certain occasions, it is in EDHEC's legitimate interest to process certain aspects of your personal data.
- **Because such processing is necessary to protect a person's vital interests.**

### 5. IS YOUR PERSONAL DATA TRANSFERRED TO THIRD COUNTRIES?

When EDHEC retains personal data on its students, employees or partners, it endeavours to do so in France or at least within the European Union. In certain cases, however, the data we gather when you use our platforms or in relation to our services may be transferred to third (non-EU) countries.

In the event of a transfer of this type, EDHEC guarantees that the transfer is made either to a country providing an appropriate level of protection or a level of protection equivalent to that demanded by European regulations, or that the transfer is governed by model contractual clauses.

No personal data is transferred outside of the European Union without you having been informed.

## 6. HOW LONG DO WE RETAIN YOUR DATA?

Your personal data is retained for the time needed to accomplish the purpose for which it was collected or for legally required timescales.

The retention period varies according to several factors and notably to:

- The needs of EDHEC's activities
- Contractual requirements
- Legal obligations (insurance, taxation, human resources, etc.)
- Recommendations issued by regulatory authorities

In certain cases, however, your data is retained after the end of our contractual relationship, e.g. to defend our legal rights, to provide you with documents that you no longer have in your possession or to comply with our legal requirements.

On completion of the intended retention period, your personal data is definitively erased.

## 7. HOW DO WE GUARANTEE THE SECURITY OF YOUR DATA?

We regularly review the technical and organisational measures enabling us to guarantee the security of our IT system and thereby to prevent any loss, alteration or non-authorized disclosure of your personal data.

## 8. WHAT ARE YOUR RIGHTS?

Your personal data belongs to you and, as such, you possess certain rights. In accordance with prevailing personal data protection laws and regulations, you possess a right of:

- **Access:** you have the right to know what personal data we hold on you, to consult it and to obtain a copy.
- **Rectification:** if you notice an error, you can ask for the incorrect data to be rectified at any moment.
- **Erasure:** under certain conditions, you can ask us to erase your personal data. Please note that we are liable to retain certain data that concerns you when prevailing laws and regulations require us to do so or when we have a legitimate reason to do so (e.g. execution of a contract or to establish, execute or defend legal claims).

- **Restriction:** under certain conditions, you can ask us to restrict the use we make of your personal data, for example, during the period of time needed to examine a data rectification request.
- **Portability:** you have the right to ask for the personal data you have provided to be sent to you or to another data processor in a structured, commonly used and machine-readable format.
- **Objection:** in certain cases, you can object to the use of your personal data for certain types of processing (e.g. for direct marketing operations).

To respond to your requests, we will require you to prove your identity.

At any moment, you may also withdraw the consent you have given us to process your data for a specific purpose.

If you consider that your rights have not been respected, you may make a complaint to the competent supervisory authority.

## 9. HOW CAN YOU CONTACT US?

For all questions concerning this policy or to exercise your rights, you may contact our Data Protection Officer at the following address: [DPO@edhec.edu](mailto:DPO@edhec.edu)