

PERSONAL DATA PROTECTION POLICY

✿ PURPOSE OF THIS PRIVACY POLICY

► Respecting your privacy and data

As a leading player in cybersecurity and data protection, Formind is a socially responsible company dedicated to safeguarding and creating the value required for the activity and development of organizations. By virtue of our role in the economy and social stability, we attach essential importance to the principles of honesty and transparency, and are keen to build a strong, lasting relationship with our ecosystem (future customers, candidates or future employees, the curious and interested individuals or organizations in various capacities) based on trust and mutual interest. Part of this commitment involves protecting and respecting your privacy, and therefore your personal data.

This is why we feel it is so important to inform you of our commitments and our policy for protecting your personal data.

Formind's commitments

1. Respect your privacy and your choices.
2. Taking into account the protection of your personal data and IT security in all our processes: that's our DNA.
3. Not to send you any communication without your consent or without legitimate need.
4. We will not sell or give away your personal data.
5. Protect the confidentiality and security of your data, by working only with service providers selected for their rigor and commitment to protecting personal data.
6. Be open and transparent about how we use your personal data.
7. Do not use your data without your knowledge.
8. Respect your rights and comply with your requests, to the full extent of our own legal and operational responsibilities.

The following Policy sets out the different types of personal data we may collect or hold about you, how we may use it, the purposes for which we collect it, how long we keep it, with whom we may share it, how we protect it and ensure its security, and your rights in relation to it.

When you provide us with personal data, or when we collect or generate personal data about you using our tools, we undertake to use it in accordance with the Policy set out below.

If you have any questions, please contact us at the following addresses:

- in Europe and North Africa: dpo@formind.fr
- in North America: responsable-RP@formind.ca

✿ WHO WE ARE & WHO'S INVOLVED

► Who we are

Formind is responsible for the personal data that you provide to us and that we process in the context of your requests, applications or the improvement of our digital service.

The terms "Formind", "we", "us" and "our" used herein refer to :

Formind,
43 rue Camille Desmoulins, 92130 Issy-les-Moulineaux, France
Represented by Hervé Morizot, co-founder

► **Who's concerned?**

The Data Protection Policy applies to users of our website who visit it, contact our services, request information or services, or apply for a job or internship.

✿ **WHAT IS PERSONAL DATA & PROCESSING?**

- **Personal data" is any information that can identify you directly (e.g. via your name) or indirectly (e.g. via a unique identifier such as your computer's IP address or cookies).**

Personal data can therefore include elements such as email address, postal address, cell phone number, user profile, photos, professional tastes or choices, service choices, user content in the form of comments or preferences, etc.

Cookies are small files that are written to your computer when you browse a website (including, for example, the pages you viewed on a previous visit, the date and time you viewed them, etc.), and which can be read when you visit a website. These cookies help us to understand your browsing habits and how you use our website.

- **Data processing is any operation that we carry out or intend to carry out directly or indirectly with the Data**, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, reconciliation or interconnection, limitation, erasure or destruction, etc., of the Data.

✿ **WHAT DATA DO WE COLLECT FROM YOU AND HOW DO WE USE IT?**

Whether you're a visitor to our website, a customer, a prospect, a correspondent or an applicant in any capacity whatsoever, a candidate or a future employee, your personal data is at the heart of our concerns.

During the course of your visit, you may be asked to use various tools or forms, depending on your needs. These are designed to facilitate and personalize your visit, but also, for us, to better understand and qualify your needs, in compliance with all applicable laws and regulations. At each stage, you may share personal data with us, or we may collect it from you.

► **How do we collect, generate or receive your Data?**

We collect your Personal Data directly from you by means of forms you fill in on our website; requests you send us in this context; consent you express to receive our communications or news; cookies we place on your terminals after informing you, when you authorize us to do so.

The collection of your Data from you is accompanied by an asterisk when necessary, to indicate the mandatory fields without which the processing of your data can not be implemented, and consequently, your request processed. The Data we request from you is essential for the following purposes:

- to collect information enabling us to secure and improve our site and our services (in particular by means of cookies);
- to provide you with the information or services you request (in particular: the sending of newsletters and commercial offers);
- offer you services or events that might interest you and meet your needs (commercial offers, events);
- consider your job application ;
- respond to your requests to exercise your rights;
- compile statistics (in particular statistics on visits to our site and pages, and applications).

✿ SUMMARY TABLE OF PURPOSES, DATA PROCESSED, BASIS FOR PROCESSING AND DATA RETENTION PERIODS

In what context may your personal data be collected?	What personal data may we hold about you?	What can we use your data for?	What is the legal basis for the processing of your personal data with regard to the purpose of the processing?	Data retention period
<p>Your navigation on our website</p> <p>Information collected via cookies or similar technologies when you browse our site (or from third parties acting on our behalf).</p>	<ul style="list-style-type: none"> ▶ Navigation information <ul style="list-style-type: none"> • Visited pages • Content you clicked on • Form you have filled in • Jobs you've been looking for • Your browsing time ▶ Information about your device <ul style="list-style-type: none"> • IP address • Your location, depending on your browser settings 	<ul style="list-style-type: none"> ▶ To enable our website to function properly <ul style="list-style-type: none"> • Adapt our site to your profile and personal settings. ▶ Ensuring the security of our website <ul style="list-style-type: none"> • Protect you from fraud or misuse of our sites and services, for example through incident detection. ▶ Drawing up statistics <ul style="list-style-type: none"> • Evaluate quantitatively and qualitatively the frequentation of our site and improve our tools and services 	<p>Legitimate interest</p>	<p>6 months</p>
<p>Your service request (training, SOC, FIR, RGPD...)</p>	<ul style="list-style-type: none"> ▶ Information about who you are and what you need <ul style="list-style-type: none"> • First name, Last name, Email, Phone number • Purpose of your request • Details of your request 	<p>Respond to your request and provide you with the requested service</p>	<p>Pre-contractual measures taken on the initiative of the applicant</p>	<p>3 years from last contact with you</p>
<p>Submitting your application to a job offer or spontaneously</p>	<ul style="list-style-type: none"> ▶ Information about your identity, your request, your professional profile and your motivations <ul style="list-style-type: none"> • First name, Last name, Email, Phone number • CV • Profile LinkedIn 	<ul style="list-style-type: none"> • Assessing your skills with a view to recruitment • Manage your application in relation to your request. <p>-----</p>	<p>The contract as a pre-contractual measure taken at the candidate's initiative</p> <p>-----</p>	<p>2 years</p>

	<ul style="list-style-type: none"> • Position sought • Message accompanying your application • Social network profile, if shared. • Additional documents if shared (cover letter, recommendation, certifications) 	<ul style="list-style-type: none"> • Compile statistics and improve our tools and service offering 	Legitimate interest	
Potential interest in our services and events that you may not be aware of	<p>► Information about who you are and services and events that may be of interest to you</p> <ul style="list-style-type: none"> • First name, Last name, Email, Phone • Service or event • Message accompanying commercial information 	Offer you other services or events that may be of interest to you and meet your needs	Consent	3 years from last contact with you
Exercising your rights regarding the processing of your personal data	<p>► Information about your identity and the right(s) exercised</p> <ul style="list-style-type: none"> • First name, Last name, Email, Phone number • Rights exercised • Organization to which your data is transferred if you exercise your right to portability • Proof of identity 	Respond to your request to exercise your rights	Legal obligation	1 year
Subscribe to our newsletter	<p>► E-mail address by which you can receive our Newsletter</p> <ul style="list-style-type: none"> • Email 	Keep you up to date with our news and publications	Consent	3 years from last contact with you

✿ WHO CAN ACCESS YOUR DATA?

▶ We may share your Data within Formind on a limited basis.

- Your personal data may be consulted by persons who need to know it in the context of their duties within Formind, and access rights have been defined internally for this purpose. Your personal data is thus sent to the various departments concerned by your request or application (Sales Department, Human Resources Department, Marketing and Communications Department, Training Department, etc.).

▶ Your Data may be processed on our behalf by trusted service providers.

- We may share your Data with some of our service providers who need to have access to some of your Data in order to carry out the mission entrusted to them, including some who are located outside France or the European Union. In such cases, Formind ensures that these contractors meet strict obligations regarding the processing, confidentiality and security of the Data to which these service providers have access. Thus, we only provide them with the Data they need to perform the service and require them not to use your Data for any other purpose.
- In this context, your Data may be transmitted to :
 - third parties who assist us and help us provide and make available to you digital services (e.g. a platform that helps us design and distribute mailings, etc.);
 - third parties who assist us and help us to know you better in order to address your needs and improve the user experience of our website (e.g. a platform that helps us to measure traffic on our website...);
 - third parties who assist us and help us provide IT services, such as platform providers, hosting services, maintenance and technical support services for our databases as well as for our software and applications that may contain data about you (these services may sometimes require access to your Data in order to perform the tasks requested).

▶ We may communicate your Data to third parties in certain specific cases:

- If we sell or are considering selling a business or assets (by any means including selling the business or assets), we may disclose your Data to the purchaser of that business or assets and to potential purchasers for the purposes of an audit including their advisers.
- If Formind or any part of its assets are acquired by a third party, the Data held concerning customers, prospects, candidates and linked to these assets represent transferred assets. In the latter case, your Data will be processed by the acquirer, who will act as the new data controller and whose data protection policy will govern the processing of your Data.
- If we are compelled to disclose or share your Data to comply with any legal obligation, or to enforce or apply our contract with you or any other circumstances to which you have agreed; or to protect the rights, property or safety of Formind, its customers or employees.
- If we have your consent to do so.
- If the law allows it.

In any case, we do not give or sell your Data.

☀ **HOW LONG DO WE KEEP YOUR DATA?**

We retain your Data only for as long as is necessary to fulfil the purpose for which we hold it, or to meet our legal obligations. See table above.

- At the end of this period, we will delete your Data from our systems and files or anonymize it so that it can no longer be used to identify you.
- In addition, we may retain certain Data for the purposes of fulfilling our legal or regulatory obligations, for legal protection or for statistical purposes.

☀ **WHERE DO WE STORE YOUR DATA AND WHAT SECURITY MEASURES ARE IN PLACE TO PROTECT IT?**

▶ **Location of your data :**

- Your Data is stored in the European Union (EU). However, it may potentially be transferred and processed outside the EU by personnel working for one of our service providers.
- Formind only transfers Data outside the EU in a secure manner and in compliance with applicable legislation. We undertake to take all necessary measures to ensure that third parties comply with the terms of this Policy. These measures may include monitoring the data protection and security standards applied by these third parties and/or signing appropriate contracts (e.g. the standard contractual clauses adopted by the European Union Commission).

▶ **Safety measures in place**

- We take all useful and reasonable precautions with regard to the nature of the Data and the risks presented by their processing, to preserve the security of the Data and, in particular, to prevent them from being deformed, damaged or accessed by unauthorized third parties.
- In addition, we ensure or require that third-party service providers who have access to your Data on our behalf do the same, by contractual means.

☀ **SOCIAL MEDIA AND USER-GENERATED CONTENT**

- If you wish, you can share your LinkedIn profile with Formind. However, we accept no responsibility for any action taken by third parties in relation to content you post on our social media sites.

☀ **YOUR RIGHTS AND CHOICES**

Formind respects your right to privacy. It is important that you have control over your Data. To this end, you have the following rights:

- **Be informed:** You have the right to obtain clear, transparent, understandable and easily accessible information on how we use your Data and on your rights. This is why we provide you with the information in this Policy.
- **Accessing and obtaining a copy:** You have the right to access the Data we hold about you (subject to certain restrictions), and to obtain a copy of it.
- **Obtain rectification:** You have the right to demand that your Data be rectified if it is inaccurate or out of date and/or be completed if it is incomplete.
- **Oppose:** You can unsubscribe or object to receiving our newsletters, commercial prospecting messages and job offers at any time by clicking on the "unsubscribe" link. You may also object to a decision based exclusively on automated individual decision-making.
- **Request for deletion and right to be forgotten:** In certain cases, you have the right to obtain the deletion or suppression of your Data. This is not an absolute right, insofar as we may be obliged to retain your Data for legal or legitimate reasons, which is often the case in human resources matters.
- **Withdrawing your consent at any time for data processing based on consent:** You may withdraw your consent to the processing of your data if such processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing based on consent carried out prior to the withdrawal of consent. Please refer to the table in the section "What data do we collect from you and how do we use it".
- **Making a complaint to a supervisory authority:** You have the right to make a complaint to the data protection authority in your country to challenge Formind's data protection and privacy practices.

- **In France, the supervisory authority is the Commission Nationale de l'Informatique et des Libertés (CNIL) - www.cnil.fr**

For all complaints, please contact the following address:

*3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07*

- **In Quebec, the controlling authority is the Commission d'accès à l'information (CAI) - www.cai.gouv.qc.ca**

If you have any complaints, please contact the following addresses:

Québec
*525, boulevard René-Lévesque Est, bureau 2.36
Québec (Québec) G1R 5S9*

Montréal
*2045 Stanley Street, Suite 900
Montréal (Québec) H3A 2V4*

However, we invite you to contact us using the details below before lodging any complaints with the relevant data protection authority.

- **Request portability of your Data:** You have the right to move, copy or transmit your data from our database to another. This only applies to data that you have provided, where processing is based on your consent and is carried out using automated processes. Please refer to the table in the section "What data we collect from you and how we use it".
- **Limiting processing:** You have the right to request the restriction of the processing of your Data. This right means that the processing of Data concerning you that we carry out is limited, so that we can retain this data, but neither use nor process it. This right applies in specific circumstances provided for by the General Data Protection Regulation, namely:
 - the accuracy of the Data is contested by the data subject (i.e. you), for a period of time allowing the data controller to verify the accuracy of the Data;
 - the processing is unlawful and the data subject (i.e. you) objects to their erasure and requests instead that their use be restricted
 - the data controller (i.e. Formind) no longer requires the Data for the purposes of processing, but the Data is still necessary for the data subject to establish, exercise or defend legal claims;
 - the data subject (i.e. you) has objected to the processing based on the legitimate interests pursued by the controller during the verification as to whether the legitimate grounds pursued by the controller prevail over those of the data subject.
- **Organizing the fate of your Data after your death:** You can give Formind instructions concerning the use and fate of your Data after your death.

To exercise any of the rights listed above, please contact us using the details below. We may ask for proof of identity and full details of your request before processing your request above.

✿ CONTACT US IF YOU HAVE ANY QUESTIONS OR WISH TO EXERCISE YOUR RIGHTS

If you have any questions or comments about how we process and use your Data, or if you wish to exercise any of your rights mentioned above, please contact us at the following addresses:

- **In France and Europe:**
43 rue Camille Desmoulins, 92130 Issy-les-Moulineaux, France - dpo@formind.fr
- **In Canada :**
*To Mr Florian CHIDJOU
Personal Information Officer
51 Rue Sherbrooke O, Montréal, QC H2X 1X2, Canada - responsable-RP@formind.ca*
- **In all cases, you can also exercise your rights online:**
From our website using the [form on this page](#).

✿ AMENDMENTS TO THIS PRIVACY POLICY

This Data Protection Policy may be modified or amended at any time. We therefore invite you to consult it as often as necessary.

Last update: 04/25/2024