

PRIVACY POLICY

The protection of your privacy and Personal Data is an important concern to which Gravotech Marking (also known as, “Gravotech”, or “we” or “us”) pays special attention, as data controller.

Gravotech is committed to protecting the rights of individuals in compliance with the **General Data Protection Regulation (reference EU2016/679)** (the “GDPR”).

This Privacy Policy will inform you about (i) the Personal Data we may collect while you use the Gravotech Academy, how we collect, use, protect and transfer your Personal Data and (ii) how you can control the processing and disclosure of your Personal Data.

What is Personal Data?

Personal Data means any information relating to an identified or identifiable data subject (you).

What Personal Data do we use?

While using the Gravotech Academy, Gravotech may collect and process:

- some Personal Data (your name, email address, phone number, the company you are working for and your country of residency) you provide us with, by creating your Gravotech Academy account , or indirectly while using your Windows ID.
- Any information generated by your activity on the Gravotech Academy (participating to classes, exams, etc.)
- any information generated when visiting the Gravotech Academy using cookies.

Cookies

The Gravotech academy uses two cookies:

- An essential cookie, the MoodleSession, is used to allow your connection to the Gravotech Academy, without having to reconnect at any time. It is therefore necessary to authorize it in your browser. This cookie is deleted from the browser and the server when you log out or exit the browser.
- An optional cookie, the MoodleID, is used to facilitate your connection by memorizing your ID in the browser. You can refuse this cookie.

What can be the purposes of your Personal Data processing?

The purposes of your Personal Data’s processings are:

- Managing the Gravotech Academy
- Hosting its content
- Controlling the access to the content
- Offering training/educational activities
- Conducting evaluations
- Monitoring the courses
- Managing the content

What is the basis for processing of your Personal Data?

The legal basis for the processing of your Personal Data are:

- *Your consent (e.g. while creating a user account)*
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- *Contract obligations or legal obligations (e.g. obligation to be trained on a product)*
- *Legitimate interest*

Who will receive your Personal Data?

We and Gravotech's data processor, in charge of the Gravotech Academy's hosting and maintenance services (SBT Human and OVH), will receive your Personal Data for the purposes mentioned hereabove.

The Gravotech entity in charge of your work agreement or in charge of the commercial relationship with your company may also receive your Personal Data.

Will your Personal Data be transferred to a third country/region outside the European Union?

We may transfer, on a need-to know basis, your Personal Data within Gravotech Group and to related third parties (including data processor). These companies may be located outside the European Union. This transfer is subject to appropriate safeguards and through the legal framework of our agreements with affiliates or with such third parties.

For how long will your Personal Data be stored?

We process and store your Personal Data as long as your account is activated and as long it is required for contractual or statutory obligations. If your Personal Data is no longer required for the performance of our obligations, this will be erased on a regular basis unless further processing is necessary, for instance, for preserving particular evidence under the GDPR, or in the context of legal statutes of limitation.

Security

We and our data processor use technical and organisational security measures to protect the data we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorised persons.

In order to guarantee the confidentiality, integrity, availability and constant resilience of processing systems and services, our data processor implements secure access via HTTPS, all of the best security practices as well as a double backup system.

What are your rights and how to exercise them?

You may at any time exercise your rights:

- to access: you have the right to know what the Personal Data are concerning you and as to whether or not your Personal Data is being processed by us (Article 15 of the GDPR),
- to rectification of your Personal Data: you have the right to change any inaccurate Personal Data concerning you (Article 16 of the GDPR),
- to erasure: you have the right for your Personal Data to be erased (Article 17 of the GDPR),
- to restriction of the processing when applicable (Article 18 of the GDPR),
- to data portability (Article 20 of the GDPR),
- to object when applicable (Article 21 of the GDPR) and
- to withdraw consent (Article 7 of the GDPR).

To this effect, please contact Gravotech either by email at the following address: dataprotection.fr@gravotech.com] or by writing to the address below, enclosing a copy of an appropriate document evidencing your identity.

Gravotech Marking

Gravotech Academy



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466, rue des Mercières

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France

Can I ask for assistance to the competent authorities?

In case of dispute or for any question, you have the possibility to lodge a claim with [the national Data Protection Authority], notably the CNIL in France.