

ARC EN CIEL RH PERSONAL DATA PROTECTION POLICY

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|----|--|---|
| 1 | APPLICABLE LEGISLATION..... | 1 |
| 2 | PERSONS CONCERNED | 1 |
| 3 | DATA CONTROLLER | 1 |
| 4 | CONTACT | 1 |
| 5 | OBJECTIVES AND LEGAL BASIS FOR THE PROCESSING..... | 1 |
| 6 | CATEGORIES AND ORIGIN OF THE DATA CONCERNED | 1 |
| 7 | DATA RECIPIENTS | 2 |
| 8 | RETENTION PERIOD..... | 2 |
| 9 | RIGHTS OF THE PERSONS CONCERNED | 2 |
| 10 | UPDATES | 2 |

1 APPLICABLE LEGISLATION

This personal data protection policy (hereafter the “Policy”) is made in application of the Regulation (EU) 2016/679 of the European Parliament and Council dated April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereafter the “General Data Protection Regulation” or “GDPR”) and the French law no. 78-17 dated January 6, 1978 relating to I.T., files and liberties (hereafter the “Data Protection law”).

2 PERSONS CONCERNED

The persons concerned by the processing carried out by ARC-EN-CIEL RH in the conditions defined hereafter are the persons responding to the questionnaire for setting-up the ARC EN CIEL DISC method, either directly from the www.arcencielrh.com website or through a certified ARC EN CIEL DISC professional.

3 DATA CONTROLLER

The data controller is ARC-EN-CIEL RH, SARL registered with the Nanterre Registry of Trade and Companies under the no. 482 093 861, with its registered office located at 19 rue Diderot 92130 Issy les Moulineaux, France.

4 CONTACT

To exercise your right to erasure of your profile ARC EN CIEL DISC, you may use : <https://www.aecdisc.com/personal-data>

To exercise your rights and for any information concerning the personal data processing setup by ARC-EN-CIEL RH you may also contact :

ARC-EN-CIEL RH 19 rue Diderot 92130 Issy les Moulineaux, France

Email : personaldata@arcencielrh.com

5 OBJECTIVES AND LEGAL BASIS FOR THE PROCESSING

The personal data processing setup by ARC-EN-CIEL RH is necessary to provide the person concerned with his ARC EN CIEL DISC profile on the basis of his responses to a questionnaire.

The processing is carried out with the consent of the person concerned.

6 CATEGORIES AND ORIGIN OF THE DATA CONCERNED

The personal data processed includes :

- identity information(name and first name) and contact details (email address) ;
- gender (male/female) ;
- the company or organization in which the person is working ;

- the person's position ;
- the date and time of setup of his ARC EN CIEL DISC profile ;
- the responses to the questions listed in the questionnaire for the setup of the ARC EN CIEL DISC method ;
- the ARC EN CIEL DISC profile resulting from the responses to the questionnaire ;
- the means by which the person concerned was informed of the ARC EN CIEL DISC.

The provision of this data is necessary for ARC-EN-CIEL RH to provide the person concerned with the ARC EN CIEL DISC profile.

The data is either provided directly by the person concerned, or through a certified ARC EN CIEL DISC professional with whom the person concerned is in liaison. The setup of an ARC EN CIEL DISC profile is made automatically, on the basis of the responses provided in the questionnaire by the person concerned, by application of the ARC-EN-CIEL RH method and know-how.

7 DATA RECIPIENTS

The personal data of the person concerned is solely intended for:

- ARC-EN-CIEL RH;
- in the event whereby the person concerned is in relation with a certified ARC EN CIEL DISC professional for the response to a questionnaire, it is solely intended for this professional. The certified ARC EN CIEL DISC professional may be an employee of this person's company or organization;
- in the event whereby the certified ARC EN CIEL DISC professional works in liaison with other certified ARC EN CIEL DISC professionals, the latter may grant access to the personal data to such professionals.

The ARC EN CIEL DISC method is distributed outside France by the ARC-EN-CIEL RH partners (master distributors). These partners have access to the data of the persons concerned located in their area.

As the case maybe, ARC-EN-CIEL RH may have recourse to sub-contractors for the setup of such processing, in compliance with Article 35 of the law of January 6, 1978 "I.T. and Liberties" and Article 28 of the GDPR.

8 RETENTION PERIOD

Personal data is kept for a period of 18 months after the setup of the person's ARC EN CIEL DISC profile.

Beyond such duration, certain data may be kept anonymously for the purposes of archiving or statistics.

9 RIGHTS OF THE PERSONS CONCERNED

Each person concerned has a right of access, rectification, erasure, limitation, restriction of processing, data portability, or the withdrawal of his consent within the conditions and limits provided by the GDPR.

The person concerned may exercise his rights at any time according to the terms mentioned in Article 4.

To ensure the confidentiality and protection of personal data, ARC-EN-CIEL RH shall request the person concerned to identify himself in order to respond to his request. To do so, the person concerned shall be asked to attach a copy of an official identity document, in support of his request, such as a valid identity card or passport.

All the claims shall be processed as soon as possible and in compliance with the applicable law. In certain cases, the personal data may only be deleted after a certain period set by the applicable regulations and the statutory period. In such case, ARC-EN-CIEL RH shall retain such data until the date permitted for its complete deletion.

In the event of a dispute with regard to the use of such data, the person concerned has a right to file a claim with the Commission Nationale de l'Informatique et des Libertés.

10 UPDATES

ARC-EN-CIEL RH may periodically modify this Policy.

The applicable version of this policy is always accessible on the www.arcencielrh.com website.