

## Personal data protection policy









### **DATA CONTROLLER:**

### **YOUR DATA IS COLLECTED BY:**

ESCP: ÉTABLISSEMENT D'ENSEIGNEMENT SUPÉRIEUR CONSULAIRE (EESC), Consular non-profit Institution of Higher Education capitalized at 8.694.000 euros registered at the trade company register of Paris under the number 824 644 587 located at 3, rue Armand Moisant 75015 Paris

Represented by Léon Laulusa as Executive President and Dean.

### **DATA COLLECTED AND PURPOSE OF THE PROCESSING IF YOUR ARE:**

ESCP Website visitors	
Participants at an ESCP event	
Prospects	
Applicants	
Participants, Students	
Staff of faculty member	
Applying for a job at ESCP	
A company representative, partner or subcontractor	

Visitor of the Website	
Data collected:	<ul style="list-style-type: none"> <li>- IP Address</li> <li>- Location of network</li> </ul> See the cookies part of our privacy policy
Purposes:	<ul style="list-style-type: none"> <li>- Improve information that we provide on our site</li> <li>- Improve operations on tasks such as registration at one of ESCP's events</li> </ul>
Legal basis	Consent, legitimate interest

Participants at ESCP event	
Data collected :	<ul style="list-style-type: none"> <li>- Identity (First Name, Last Name)</li> <li>- Contact details (email address...)</li> <li>- Company/ Faculty/ School/ Organisms</li> <li>- Function/Job</li> </ul>
Purposes:	<ul style="list-style-type: none"> <li>- Management of invitations and logistical organisation for the event</li> <li>- Knowledge on the number of events registered</li> <li>- Inform you on the event (schedule modification, cancelling...)</li> </ul>
Legal basis	- Consent, legitimate interest

Prospect	
Data collected:	<ul style="list-style-type: none"> <li>- Identity (Last Name, First Name, Title..)</li> <li>- Personal contact detail (city, country of residence, email adress, phone number...)</li> <li>- Professional contact detail</li> <li>- Commercial ID</li> <li>- Hobbies</li> <li>- Start of the Academic year</li> <li>- Work life (diploma, area of study, years of professional experience, position, company...)</li> <li>- Choice of programs</li> <li>- Other application, schools</li> </ul>
Purpose:	<ul style="list-style-type: none"> <li>- Fulfilment of marketing operations based on the consent of the person concerned</li> <li>- Selections of people to carry out operations such as prospection, loyalty, researches</li> <li>- Production statistics (trade...)</li> <li>- Handover, rental or exchange of its client or prospect files to the various ESCP campuses or to all commercial and academic partners</li> </ul>

	<ul style="list-style-type: none"> <li>- Management of requests for access, rectification and opposition rights</li> </ul>
Legal basis	<ul style="list-style-type: none"> <li>- Consent</li> </ul>

Candidate	
Data collected:	<ul style="list-style-type: none"> <li>- Identity (Last Name, First Name, Title..)</li> <li>- Personal contact detail (city, country of residence, email adress, phone number...)</li> <li>- Professional contact detail</li> <li>- Commercial ID</li> <li>- ID picture</li> <li>- Hobbies</li> <li>- Work life (diploma, area of study, highest degree, years of professional experience, position, company...)</li> <li>- Start of Academic term</li> <li>- Program choices</li> <li>- Other applications</li> </ul>
Purpose:	<ul style="list-style-type: none"> <li>- Fulfilment of marketing operations based on the consent of the person concerned</li> <li>- Fulfilment of processing operations related to client relationship management and in particular those relating to technical prospecting operations (including technical operations such as normalization, standardization, improvement and deduplication)</li> <li>- Selections of people to carry out operations such as prospection, loyalty, researches</li> <li>- Production statistics (trade...)</li> <li>- Handover, rental or exchange of its client or prospect files to the various ESCP campuses or to all commercial and academic partners</li> <li>- Management of requests for access, rectification and opposition rights</li> </ul>
Legal basis	<ul style="list-style-type: none"> <li>- Pre-contractual measures, consent</li> </ul>

Students, Participants	
Data collected :	<ul style="list-style-type: none"> <li>- Identity (Last Name, First Name, Title...)</li> <li>- Personal contact detail (city, country of residence, email address, phone number...)</li> </ul>

	<ul style="list-style-type: none"> <li>- Work Life (diploma, area of study, highest degree, years of professional experience, position, company, CV, socio-professional category...)</li> <li>- Data relating to means of payment: bank details, check number and or credit card, credit card date of expiration</li> <li>- Transaction number, detail on subscribe services</li> <li>- Contractual relation historic</li> <li>- ID picture</li> <li><b>Specific to online course and online proctoring</b></li> <li>- Video footage</li> <li>- Sound</li> <li>- Identification information</li> <li>- Account credentials</li> <li>- Account User Data</li> <li>- Session settings</li> </ul>
Purpose :	<ul style="list-style-type: none"> <li>- Creation of an account on ESCP's digital tools</li> <li>- Acquisition of services</li> <li>- Application and Admission management</li> <li>- Student enrolment and education management</li> <li>- Communications management and exchanges follow-up</li> <li>- Preparation and dissemination of student directories</li> <li>- Billing</li> <li>- Contractual relationship follow-up</li> <li>- Outstanding and disputes management</li> <li>- Management of consents and authorization concerning the use of data</li> <li>- Sending of newsletters and commercial solicitations especially through electronic means</li> <li>- Transmission to partners and subcontractors taking part in the education</li> <li>- Compliance with applicable legal and required obligations, and especially with transmission data requests by public authorities and administrations</li> <li>- Transmission to the Alumni Association and the ESCP Foundation</li> <li>- Transmission to partners in charge of processing and awarding degrees</li> <li>- Transmission of data to companies and especially the resume;</li> <li>- personal data transmission to certification and ranking organizations and agencies</li> <li>- Management to avoid fraud risks</li> </ul>

	<ul style="list-style-type: none"> <li>– Processing necessary for the legitimate interests pursued by ESCP (Article 6f) and recital 47 of the GDPR.</li> </ul> <p><b>Specific to online course and online proctoring</b></p> <ul style="list-style-type: none"> <li>– To remotely identify test takers</li> <li>– Monitor the exam process</li> </ul>
Legal basis	<ul style="list-style-type: none"> <li>– Performance of the contract, legitimate interest, legal obligation, consent</li> </ul>

Collaborators	
Data collected :	Contact HR department or dpo@escp.eu
Purposes :	

Applicant for a position at ESCP (hiring)	
Data collected:	<ul style="list-style-type: none"> <li>– Title</li> <li>– Picture</li> <li>– Resume/CV and cover letter</li> <li>– ad</li> </ul>
Purposes:	<ul style="list-style-type: none"> <li>– Process of application</li> <li>– Management of recruitment procedures</li> <li>– Reply to job applicants and intern applicants</li> <li>– Management of disputes</li> </ul>
Legal basis	<ul style="list-style-type: none"> <li>– Consent, legitimate interest, performance of the contract</li> </ul>

Representants of enterprises, partners et subprocessors	
Data collected:	<ul style="list-style-type: none"> <li>– Title</li> <li>– Professional contact detail (phone number, email address...)</li> <li>– Company</li> <li>– Position</li> </ul>
Purpose:	<ul style="list-style-type: none"> <li>– Contact related to the contractual relationship</li> </ul>
Legal basis	<ul style="list-style-type: none"> <li>– Performance of the contract</li> </ul>

**DATA COLLECTION:**

The data collected by ESCP during the following operations and process:

- When navigating via an ESCP Business School websites or landing page
- When creating an account or a personal space on ESCP Business School websites
- When an information request is made
- When documentation is requested or downloaded (flyer, information leaflet...)
- When ordering products or services
- When registering using any ESCP Business School form
- During a marketing campaign

**DATA TRANSMISSION AND/OR DESTINATION:**

Data may be transmitted especially to:

Partners	Legal basis	Data subject							
ESCP campuses	Contract	Light Blue	Blue	Dark Blue					
Foundation	Contract, consent	Light Blue	Blue	Dark Blue					
Alumni	Contract, consent	Light Blue	Blue	Dark Blue					
Ministère de l'éducation nationale Ministre of Education	Legal requirement	Dark Blue							
Conférence des grandes Ecoles CGE	Consent	Dark Blue							
Accreditations, Rankings	Contract, consent	Dark Blue							
Partners, pedagogic processors	Contract, consent	Blue	Dark Blue	Green					
Partners, technical processors	Contract, consent	Red	Orange	Purple	Light Blue	Blue	Dark Blue	Light Green	Dark Green
Partners, marketing communication processors	Contract, consent	Light Blue	Blue	Dark Blue	Purple				

If data is transmitted outside the European Economic Area, ESCP shall ensure that the processing of such data is carried out in accordance with the applicable personal data policy (GDPR)

**DATA RETENTION PERIODS:**

ESCP keeps personal data for the time necessary to achieve the purposes specified above, as well as to comply with its legal and required obligations.

**For information purposes only:**

Retention period of personal data		
Registration files (personal information, copy of degree, titles and works...) of the student	8 years from registration	Turin
Grades, degrees, and results obtained	50 years after the test or graduation	
Documents produced by the student, internship reports, and proof copies	1 year from tests	
Student's thesis	5 years	
Data concerning a third-party payer	3 years from the last payment made	
Identity document transmitted as part of the right of access, modification and deletion	1 year from the receipt	
Data concerning an applicant not becoming a student of ESCP	3 years from the data communication	
Data concerning a prospect	3 years from the data communication	

**DATA HOSTING:**

The different categories of data collected and processed by ESCP are mostly hosted in the European Union.

ESCP takes all the necessary measures to ensure the security of the data hosted outside the European Union like signing standard contractual clauses for the transfer of personal data to third countries.

Data protection/Security

ESCP protects personal data, using secured digital tools.

ESCP and its subcontractors comply with the security standards, especially when processing credit card payments.



ESCP implements electronics security measures and procedures to ensure security risks concerning the collection, storage, retention and transmission of personal data.

### **YOUR RIGHTS:**

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data Protection Regulation (GDPR) and the law of the 6th of January 1978 related to data processing, files and liberties, and the GDPR, people have a right to access, modify, oppose and delete their personal data by writing to the following address:

- By post: SERVICE DATA PROTECTION OFFICER – ESCP, 3, rue Armand Moisant, 75015 Paris
- By e-mail: [dpo@escpeurope.eu](mailto:dpo@escpeurope.eu)

This request must be signed and accompanied by photocopy of an identity card bearing the signature of the holder and specify the address to which the response must be sent. A response will then be sent to the applicant within 1 months of receiving the request.

If, despite our response, you were not satisfied, you have the possibility to contact the CNIL directly at the following address <https://www.cnil.fr/en/contact-cnil>.

### **\*Important Information:**

- It is specified that the data required for the education must be kept. If the student exercises his/her right to delete data concerning himself/herself before the end of his/her education, he/she will be alerted by the ESCP's services. If the student confirms his/her wish concerning this deletion, he/she will be deemed to have purely and simply renounced his/her education and will be considered to have resigned.
- It is specified that the data needed to finance schooling must be kept. If the student or the third-party payer exercises his/her right to delete data concerning himself/herself before the end of his/her education or before the end of the financing of his/her education, the student or the third-party payer will be alerted by the ESCP's services. If he/she confirms his/her wish concerning this deletion, all amount still due will become immediately payable, despite any staggered payment agreement. Failure to pay will result in suspension of schooling.



Finally, each person concerned by the processing of his/her data has a right to the portability of the data he/she has transmitted.

This right applies under the same conditions as the right of access and rectification.

### **COOKIES:**

A cookie is a text file placed on your computer when you visit a website or view an advertisement. Its purpose is to collect information about your browsing activity and to provide you with services tailored to your terminal (computer, mobile or tablet). Cookies are managed by your web browser.

ESCP's websites can only read or write cookies that belong to them.

These cookies allow in particular to:

- Recognize the browser during the visit(s);
- Link an action to the provision of the requested service;
- Record the language spoken or other preferences needed to provide the requested service;
- Ensure load balancing and manage traffic;
- Follow the website audience;
- Develop statistical analyses
- Suggest commercial offers related or not to your interests

Anyone using ESCP's websites can make his/her choices regarding the use of cookies.

If you contribute to social networks, they may activate their own cookies.

You can choose to deactivate these cookies at any time.

In order to manage cookies more closely to your expectations, we invite you to configure your browser according to the purpose of the cookies. To manage cookies on different browsers:

- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=fr>
- Internet Explorer: <https://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies#ie=ie-11>
- Mozilla Firefox: <https://support.mozilla.org/fr/kb/effacer-cookies-supprimer-infos-sites-enregistrees>
- Safari: <https://support.apple.com/kb/ht1677?viewlocale=frFR&locale=frFR>



The settings are likely to have an impact on internet browsing and on the operation of certain services requiring the use of cookies.

For any additional information on cookies, the French National Commission for Information Technology and Civil Liberties (CNIL) has upload an explanatory notice: <https://www.cnil.fr/vos-droits/vos-traces/les-cookies/>

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