

PRIVACY POLICY

1. Why this policy?

Whenever you use the platform that can be accessed from the Visions Trust's website [https://visionstrust.com] (hereinafter the "**Platform**") and enables to connect stakeholders in the education resource sharing ecosystem, we may collect personal data about you. Personal data is any data that can be used to identify an individual directly or indirectly.

The purpose of this policy is to inform you about the means we use to collect and use your personal data, in strict compliance with your rights. In this respect, we inform you that we comply, in the collection and management of your personal data, with Law No. 78-17 of 6 January 1978 relating to information technology, files and freedoms, in its current version, as well as with the General Data Protection Regulation No. 2016/679 of 27 April 2016.

2. Who processes your data?

The person who makes the decision to collect and use your personal data is the company VISIONSTRUST, a French simplified joint stock company, registered with the Commerce and Business Registry of Paris under the number 834 259 889, whose head office is located at 366 rue de Vaugirard – 75015 Paris, France (hereinafter "**Us**" or « **We** »).

3. Which data is processed?

For the proper performance of Services, we offer via our Platform (hereinafter the "**Services**"), and as specified in our general terms and conditions, we collect the following data directly from you:

- Information enabling you to be identified: surname, first name, email address, computer login (user login/password).
- Information relating to your business life: job title, name of the company.
- Information relating to the subscription: subscription fee and details.
- any information you choose to provide via the contact form or the after-sale service email.

If you subscribe to some Services offered on our Platform, as specified in our general terms and conditions, we may also receive from our payment provider, Stripe, some personal data about you that Stripe, acting as our data processor, collected directly from you during the transaction, such as:

- Transaction and payment information: credit card numbers, name of the cardholder, transaction details and history.

For more information about personal data that Stripe collects and processes about you, please consult [Stripe's privacy policy](#).

Whenever you use the Platform, and for the proper performance of our Services, we may also collect personal data about you, automatically via technical cookies and trackers that we place on your terminal. The data collected is as follows:

- connexion information and relating to the equipment and devices you use to connect to the Platform : we collect connection data from devices when you access and use the Platform, including if you have not opened an account on our Platform, and in particular, your IP address, dates and times of connection, data relating to the hardware and software used, unique identifiers, crash data, pages viewed or displayed before or after connecting to the Platform.
- Information about your use of the Platform's tools and features: we collect information about your interactions with the Platform and, in particular, the pages or content consulted on the Platform, and the links you clicked on.

For more information about the cookies and trackers that we use and their configuration, please consult [our cookie management policy](#).

4. Why do we process your data?

Your personal data is collected and used for one or more of the following purposes:

- (i) To manage your access to and use of the Platform and the Services available on this Platform, and to respond to any request concerning your use of the Services.
- (ii) To carry out operations relating to the management and monitoring of our contractual relations with users when using our Services.
- (iii) Build up a file of registered administrators and users.
- (iv) To send you information about our latest news and/or any evolution of our Services. If you do not wish to receive such information, we give you the option to opt-out when your data is collecting or when you receive from us the information message.
- (v) To compile statistics on the use of and visits to our Services.
- (vi) To optimize the proper functioning and efficiency of the Services.
- (vii) To manage any disputes or legal proceedings arising from the performance of the Platform and the provided Services.

- (viii) To handle your requests about the Platform or the Services we provide or simply for the right of access, rectification and opposition, deletion, limitation, portability or the right to lodge a complaint with the competent authority.
- (ix) To comply with our legal and regulatory obligations.

When collecting your personal data, we inform you whether certain data is mandatory or optional. We also tell you what the possible consequences are of not answering.

Finally, we would like to point out that we never use your data to make automated decisions about you.

5. How we justify the collection and use of your data?

We can only use your data if the law allows us to do so. In this context, the legislator has provided for six cases in which the use of data is justified (called "**legal bases**"). The use of your personal data is always based on one of these six legal grounds.

With regard to purposes (i) and (ii), the collection of your data is strictly necessary for the performance of Services offered to you via the Platform. The basis of the use is the performance of the contract between us. Your express consent to this collection is therefore not required.

For purposes (iii) to (vii), the collection and use of your personal data is in the legitimate interest of our company and is not subject to obtaining your prior consent.

With regard to purposes (viii) and (ix), your data is collected and used to meet our legal obligations. Your consent is not required for this processing.

For any use of your data that is not covered by this policy, we will seek your consent to any new use of your data where this is necessary. If your consent is not required, we will nevertheless inform you prior to the implementation of this new processing.

6. To whom your data is communicated?

- *General terms*

Your data will be communicated only to those members of our staff who need to access your data, as well as to our possible technical subcontractors (payment provider (Stripe), IT service providers, website host). They will have access to your data only to the extent necessary for the performance of their respective tasks. Furthermore, our possible subcontractors act solely on our instructions for the sole purpose of carrying out the tasks that we entrust to them.

In the event of a dispute, your data may also be communicated to court officers, judicial officers (bailiffs, clerks) or magistrates.

All recipients undertake to ensure the strictest confidentiality of your personal data in their possession.

- *Stripe's specific case*

Moreover, and as we mentioned above, we use for payments the Services of our provider called Stripe, that may also collect personal data about you during transaction or via cookies and similar technologies, in its capacity as data controller.

The personal data Stripe collects may include transactional data and identifying information about devices used. Stripe uses this personal data to operate and improve the services it provides to us, including for fraud detection, loss prevention, authentication, and analytics related to the performance of its services.

We also inform you that data collected by Stripe, as controller, or our processor, may be transferred outside the European Union, such as the United States. In any case, we ensure you that the transfer is made to countries recognized as providing an adequate level of protection for your personal data or, at the very least, on the basis of the appropriate safeguards provided by law.

For more information on the use of your personal data by Stripe and how to exercise your rights, please consult [Stripe's privacy policy](#).

7. How long your personal data is kept?

Your data will only be kept for as long as is strictly necessary for the purpose for which it was collected. In any case, your personal data will not be kept beyond this period.

- (i) *Data relating to the management and the monitoring of our contractual relations with users of our Services on the Platform (purposes (i) to (iii))*

Your personal data will not be kept beyond the time strictly necessary to manage our contractual relations with you, i.e. at the latest upon the deletion of your account, increased by a period of three (3) years from the end of our contract for prospecting purposes.

After this three-year period, we may contact you again to find out whether you wish to continue to receive commercial solicitations. In the absence of a positive and explicit response from you, data will be deleted.

Beyond that, data enabling proof of a right or contract to be established, which must be kept in our intermediate archiving base to comply with a legal obligation, will be kept for the period stipulated by the law in force, i.e. a period of five (5) years.

It being specified that any account that would not been used by the account holder for 2 years from the date of its creation, will be deemed inactive and deleted as well as the related data. Before this period expires, we will contact you to give you the opportunity to express your wish

to keep your account active. In the absence of a clear and positive response from you, data will be deleted and your account deactivated.

- (ii) *Data relating to the letter of information about our latest news and/or any evolution of our services (purpose (iv))*

Data collected for this purpose will be kept until you unsubscribe.

- (iii) *Data relating to the proper functioning and optimisation of our Services on the Platform (purposes (v) to (vi))*

Data collected for the purpose of improving our Services and compiling statistics is kept for a maximum period of one year.

- (iv) *Data used in the context of a dispute or legal proceedings (purpose (vii))*

Data used to serve any dispute or legal proceedings that may arise between us regarding the performance the Services we provide via the Platform, is kept for the entire duration of the proceeding in progress and until a final court decision has been handed down.

- (v) *Requests relating to the use of the Platform or the exercise of your rights (purpose (viii))*

When you contact us to request information about the Platform or the Services, we provide you or simply to exercise one of your rights specified below, your data is kept for the time necessary to process your request.

Beyond that, we keep this data in our intermediate archive for an additional period of up to five (5) years, corresponding to the period during which legal action could be taken on the basis of the processing of your request.

- (vi) *To comply with our legal and regulatory obligations, and in particular our accounting obligations (purpose ix)*

As part of the management of our contractual relations, certain data is collected to enable us to meet our accounting obligations, and particularly the legal retention period for supporting documents.

This data will therefore be kept for a period of ten (10) years from the date of issue of the supporting document.

8. Security

We inform you that we take all necessary precautions, as well as all appropriate organisational and technical measures to preserve the security, integrity and confidentiality of your personal

data and, in particular, to prevent them from being distorted, damaged or accessed by unauthorised parties.

9. Where is your data hosted?

We inform you that your data is kept and stored for the duration of their retention on the servers of the company SCALEWAY, which are located in France.

10. How can you access your personal data ?

You have the right to access your personal data in order to obtain communication and, if necessary, rectification or deletion, by sending us a letter to:

- Email address : **contact@visionspol.eu**
- Postal address : Visions, **366 rue de Vaugirard, 75015, Paris France**

We also remind you that any person may, on legitimate grounds, request the restriction of the processing of data concerning him or her or object to such processing.

We inform you that in the event of rectification or deletion of your personal data, as well as limitation of processing, carried out following a request from you, we will notify the persons to whom we have communicated your data of such changes, unless such communication proves impossible.

11. Portability of your personal data

You have a right to the portability of the personal data you have provided to us as part of your registration to the Platform to access our Services. We remind you that this right does not apply to data collected and processed on a legal basis, other than consent or the performance of the contract binding us, and in particular to data collected in our legitimate interest.

This right can be exercised free of charge, at any time, in order to recover and retain your personal data.

In this context, we will send you your personal data, by any means deemed useful, in an open standard format commonly used and readable by machine, in accordance with the state of the art.

12. Complaining to a supervisory authority

You are also informed that you have the right to lodge a complaint with the *Commission Nationale Informatique et Libertés* (CNIL) if you consider that the processing of your personal data, which is the subject of this policy, constitutes a violation of the applicable texts.

This recourse may be exercised without prejudice to any other recourse before an administrative or judicial jurisdiction. Indeed, you also have the right to an effective administrative or judicial appeal if you consider that the processing of your personal data, which is the subject of this Charter, constitutes a violation of the applicable texts.

13. Communication regarding personal data breach

If we become aware of a security breach in the processing of your data that could result in a high risk to your rights and freedoms, we will inform you as soon as possible. At that time, we will detail the nature of the breach, and the measures implemented to put an end to it.

14. Modifications

We reserve the right, at our sole discretion, to modify the present charter, in whole or in part, at any time. These modifications will come into effect as of the publication of the new charter, which will be notified to you by any means deemed useful.

15. Entry into force

This policy is entered into force the 19/09/2024.