

## CHARTER CONCERNING THE PROTECTION OF PERSONAL DATA OF CLIENTS

### 1. Definition and nature of personal data

During your use of the site <http://www.assessfirst.com> (hereinafter referred to as the "Website"), we may ask you to provide us with personal data about you.

The term "**personal data**" means any data that enables a person to be identified, which corresponds in particular to your surname, first name, gender, postal and email addresses, telephone numbers, date of birth, spoken language, sector, job title, position, level of education, level of career, as well as any other information that you may provide relating to your professional skills and experience, business name, business postal address, business phone numbers, internet website address, intra-community VAT number, data related to your transactions on the Website, details concerning your subscriptions, as well as any other information that you chose to send us about you.

### 2. Purpose of this Charter

The purpose of this charter is to inform you of the means that we use to collect your personal data, with the strictest respect for your rights.

We would like to point out to you on this subject that we comply, in the collection and management of your personal data, with the current version of the French law N° 78-17 dated 6th January 1978 on Computer Processing, Filing Systems and Liberties.

### 3. Identity of the entity responsible for collecting data

The entity responsible for collecting your personal data is AssessFirst, a simplified joint-stock company, registered under number 443 179 684 with the Registry of Trade and Companies of Paris, whose head office is located at 20, Rue du Sentier, 75002 Paris, France (hereinafter referred to as: "**Us**" or "**We**").

### 4. Collecting Personal Data

Your personal data is collected to meet one or several of the following requirements:

- (i) To manage your access to certain services available on the Website and their use.
- (ii) To carry out operations relating to client management concerning contracts, orders, deliveries, invoices, loyalty schemes, follow-up with clients, etc.
- (iii) To make up a file of registered members, users, clients and prospects.

- (iv) To send newsletters, entreaties and promotional advertisements. If you do not wish to receive these, we offer you the option to express your refusal in this regard when your data is being collected.
- (v) To provide commercial and web traffic statistics for our services.
- (vi) To organize competitions, lotteries or any other promotional campaigns with the exception of online gambling which is subject to the Regulatory Authority for Online Gaming.
- (vii) To manage reviews on products, services or content.
- (viii) To manage unpaid invoices and potential disputes regarding the use of our products and services.
- (ix) To respect our legal and regulatory obligations.

We will inform you, when requesting your personal data, if certain data must be provided or if it is optional. We will also inform you of the consequences should you not wish to provide this data.

#### **5. Recipients of the collected data**

Only our company's staff, authorities in charge of audits (external auditors in particular) and our subcontractors will have access to your personal data.

Government agencies may also be recipients of your personal data, exclusively to meet our legal obligations, or representatives of the law, ministerial officers or organisations responsible for the collection of debts.

#### **6. Transfer of Personal Data**

Your personal data may be transferred, loaned or exchanged with third parties. If you agree to this, we offer you the option to check a box expressing your agreement when your data is being collected.

#### **7. Duration that Personal Data is held**

- (i) Concerning your data relating to client and prospect management:

Your personal data shall not be held any longer than is strictly necessary for the management of our business with you. However, data that enables a right or a contract to be proven, that must be held as a legal obligation, shall be held for the term stipulated by the law in force.

Concerning potential prospecting operations for clients, their data may be held for a period of three years after the termination of the business contract in question.

Personal Data relating to a prospect, who is not a client, may be held for a period of three years from the moment it is collected or from the last contact with the prospect.

At the end of this period of three years, we may contact you again in order to find out if you wish to continue to receive commercial prospecting.

(ii) Concerning identity documents:

In the event of exercising the right to access and rectify collected personal data, information related to identity documents may be held for the period provided for in Article 9 of the French Code of Criminal Procedure, that being one year. In the event of exercising the right of opposition, this data may be archived throughout the statute of limitation provided for in Article 8 of the French Code of Criminal Procedure, that being three years.

(iii) Concerning data relating to banking cards:

We do not keep data relating to banking cards any longer than the time necessary to enable the transaction to be processed, with the exception of our subscriptions, to facilitate payment by our regular clients. In this case, this data is held throughout the term of your subscription and at least until you carry out your last transaction.

By checking the box on our Website expressly reserved for this purpose, you give us your express consent to keep this data.

Your banking card's security code or CVV2 code is not stored.

In the event of payment by banking card, data relating to the card may be held for the purposes of evidence in the event the transaction is contested, in intermediary archives, for the period stipulated in Article L 133-24 of the French Monetary and Financial Code, namely 13 months following the date the card is debited. This period may be extended to 15 months in order to take into account the possibility that deferred payment cards were used.

(iv) Concerning the management of opposition lists receivable from prospecting:

Information allowing your right of opposition to be taken into account is held for a minimum of three years from the moment you exercise this right of opposition.

(v) Concerning web audience analysis statistics:

Information stored in users' terminals, or any other element used to identify users and enable tracking or traffic analysis, is not held any longer than 6 months.

## 8. **Security**

For your information, we take all necessary precautions and appropriate organisational and technical measures to maintain the security, integrity and confidentiality of your personal data, and especially to prevent it from being deformed or damaged and to prevent any third party from accessing it. We also use secured state-of-the-art payment systems that comply with any applicable regulations.

## 9. **Cookies**

Cookies are text files that are often encrypted and are stored in your browser. They are created when a user's browser loads a given website: the website sends information to the browser, which then creates a text file. Each time the Client comes back to the same website, the browser recovers the file and sends it to the website's server.

There are two types of cookie and they do not have the same purpose: technical cookies and advertising cookies:

- Technical cookies are used throughout your browsing in order to facilitate certain functions. A technical cookie can be used, for example, to remember answers previously filled in to a form, or a user's language or presentation preferences for a website, when these options are available.
- Advertising cookies can be created not only by the website which the user is visiting but also by other internet websites displaying advertisements, ad banners, widgets or other elements on the page that is being displayed. These cookies can be used to carry out targeted advertising for example, which is advertising that is determined by the user's browsing habits.

We use technical cookies. These are stored in your browser for a period of 6 months.

We do not use advertising cookies. However, if we should decide to use them in the future, we will inform you prior to this and you will have the option to deactivate these cookies should you wish.

We use an audience analysis statistics tool that generates a cookie that enables us to measure the number of visits to our Website, the number of page views and visitors' activity on the Website. This cookie is stored for a maximum of 6 months. Your IP address is also collected to determine the city you are connecting from.

We would like to remind you that you may refuse cookies by configuring your browser to this end. However, such a refusal may prevent the Website from functioning correctly.

## **10. Consent**

When you choose to provide your personal data you expressly give your consent for the collecting and use of this data in compliance with the provisions set forth in this charter and the legislation in force.

## **11. Access to your personal data**

In accordance with French law N° 78-17 dated January 6, 1978 on Computer Processing, Filing Systems and Liberties, you have the right to obtain and, where appropriate, correct or delete information concerning you.

For this, you may contact us at:

- Email Address: **hello@assessfirst.com**
- Postal Address: AssessFirst, 20, Rue du Sentier, 75002 Paris, France.

By way of reminder, any person may, for legitimate reasons, oppose the processing of their Personal Data.

## **12. Amendments**

We reserve the right, at our sole discretion, to modify all of this charter or any portion thereof. These changes will be effective from the time of publication of the new charter. Your use of the Website following the entry into force of these changes shall constitute acknowledgement and acceptance of the new charter. If you are not in agreement with the new charter, you should refrain from accessing the Website.

## **13. Entry into Force**

This charter becomes effective on **January 4, 2015**.

