

PRIVACY POLICY



UPDATED MAY 2018



At Chameleon we respect your privacy. We are committed to protecting and processing your personal data in strict compliance with data protection, and in full transparency. Take a minute to familiarise yourself with our commitments to the protection of your personal data. If you want to know more about the use and protection of your data, we invite you to read our Privacy Policy below.

Our commitments to protecting your privacy

1. We use your data to provide you with the best HR and learning experience

We need to collect and store your data, such as your name, email address, and preferences to provide you with better quality services. We do not sell or share your data with 3rd parties without your permission.

We use this data to stay in touch and to listen to what you - our customers and community - tell us, so we can provide you with new and better services.

2. We use your data to provide you with information and services that suit you better

We use your data and preferences to develop innovative and tailored info and learning solutions to suit all the profiles of our community.

If you choose to receive our Chameleon newsletter we will share with you inspiration, news and tools on learning and HR, free guides and resources, and exclusive invitation to networking events and conferences.

3. You keep control of your data.

If you no longer wish to receive our newsletter, you can view and change your preferences at any time by clicking on the unsubscribe link at the bottom of each newsletter.

If you want to obtain more information about the data we have about you or if you want to exercise your rights of rectification, portability, erasure of your data and your rights to object and limit processing, simply contact us at RGPD@learningchameleon.com

4. We make your privacy a priority for us

Collecting, processing, storing and sharing your data securely is a priority. To provide you with our products and services, we share your data with our service providers and make every effort to ensure that they are just as careful when processing your data.

Privacy Policy

The purpose of this Privacy Policy is to inform you, in the most clear and concise way possible, how we process your personal data when you use our websites, and/or our learning services and products. It explains:

1. **What data do we collect?**
2. **For what purposes and on what legal basis is your data processed?**
3. **How do we protect your data?**
4. **Who can access your data?**
5. **What are your rights and how to exercise them?**
6. **How long do we keep your data?**
7. **How do we use cookies?**
8. **Will this Privacy Policy change?**

1. What data do we collect?

Your personal data is data that allows your identification either directly (data such as your name and surname), or indirectly (data such as your postal code, your phone number or your email allows your identification indirectly).

During our interactions with you, we may have to collect different data depending on the types of products / services concerned:

- Identification data (surname, first name, address, telephone number, email address, etc.)
- Demographic data (such as gender, language, age)
- Business profile (preferred products and services, preferred modes of communication, etc.)
- Geolocation data, including your IP address or location
- Information relating to navigation and behaviour on our website (depending on the pages viewed, the products viewed, searches performed, etc.)
- Personal information contained in CVs or cover letters, if you have applied for a vacancy with our company

2. For what purposes is your data processed?

We process your data for various purposes. For each type of processing, only the data relevant to achieving the purpose in question is processed.

A. General Information

We use your data only for the purposes to which you have agreed. When you opt-in to receiving communications from Chameleon, we will send you newsletters containing news and tools on learning and HR, free guides and resources, exclusive invitation to networking events and conferences and commercial information about new services and products.

If you do not wish to receive our Newsletters, you can withdraw your consent at any time via the link integrated directly into the Newsletter.

When buying learning services or products from us, as part of the [execution of your contract](#) or for the actions taken in order to conclude the contract. We need to collect some of your data to execute contracts we engage in to:

- Provide and monitor the products or services purchased
 - Guarantee you an optimal customer experience and quality after-sales service
 - Be able to deal with your questions, messages or requests and to respond to it
- to comply with all [legal and regulatory obligations](#) to which we are subject, including:
 - implementation of legislation (such as the GDPR)
 - corporate tax and accounting obligations
 - for reasons that are in our [legitimate interest](#). In this context, your data can be processed in order to:
 - Protect Chameleon intellectual and material property
 - Disclose any abuse or fraud that may cause prejudice to the financial status, results and/or reputation of Chameleon
 - Exercise, defend and preserve our rights, or to compile the proof of a possible violation of our rights
 - Manage and improve your customer experience with us
 - Continuously improve our website and our products/services (in particular by analysing data collected via cookies)
 - Adjust our products and services that are available to you and adapt them to your needs, in particular by offering tailored services that could interest you based on the customer profile created for you
 - Analyse data, establish sales and sales activity reports, frequency of visits and establish marketing profiles

B. Profiling

To better meet your needs:

- We determine general or specific customer profiles, including your profile, which is a summary of the information you have shared with us, and/or the products/services you have used.

3. How do we protect your data?

Chameleon is committed to maintaining the confidentiality and security of your data and to implementing appropriate security measures to prevent the loss, destruction, misuse, unintentional modification or disclosure of your data:

- a. By updating security measures as the technology evolves, as needed
- b. By ensuring that your data are not accessible to unauthorised persons
- c. By requesting a proof of identity before being able to provide you with any personal information about you as part of the security procedures
- d. By deleting or anonymising your data at the end of the legal or contractual period or if Chameleon does not need it any more for the for the purposes for which the personal data was collected.

4. Who can access your data?

Chameleon commits to not sell or share your data with 3rd parties without your permission.

Chameleon may be legally obliged to transfer some of your data to the competent authorities, in the context of legal proceedings.

You can access the data we have collected about yourself anytime (contact us at RGPD@learningchameleon.com). See next question on your rights for more detail.

5. What are your rights and how to exercise them?

In accordance with the law, you have a right of access, a right of rectification, a right of erasure and a right to portability of your data. These rights can be exercised at any time.

A. General rights

- **Right of access:** You have the right to access the data concerning you and to receive a copy.
- **Right of rectification:** We take all reasonable steps to ensure that the data we hold is up-to-date and to delete data that is incorrect or no longer required for processing. If you find that your data is inaccurate or incomplete, you have the right to ask us to correct it.
- **Right to erasure ("right to be forgotten"):** in certain circumstances (for example when you withdraw your consent or when the processed data is no longer necessary for the purpose of the processing), you have the right to ask us to delete your data.
- **Right to restrict the processing:** you may request the limitation of the processing of your data, in which case your data will no longer be processed (but will be retained).
- **Right to data portability:** you have the right to the data you have provided being transmitted to you in a structured format.
- **Right of opposition:** You have the right to object to the processing of your data in the context of direct marketing and no exception can be opposed by Chameleon. It also includes the right to object to profiling as it relates to direct marketing.

B. Withdrawing your consent

You can withdraw your consent at any time. This means you can unsubscribe at any time from our newsletters and other communications we share with you. You will be put in "opt-out".

You can unsubscribe by contacting RGPD@learningchameleon.com or by clicking on the unsubscribe link at the bottom of each newsletter.

However, please note that when you exercise your right to object to the sending of our newsletter (or direct marketing), this only applies to the given e-mail address.

6. How long do we keep your data?

When your data is collected based on your consent, we use it only until you withdraw your consent. From the withdrawal of your consent, your data will be kept for the minimum amount of time necessary to accomplish the necessary technical measures to delete or anonymise your data.

When your data is used to provide you with our services (e.g. completion of a contract regarding our learning services or products, responding to your questions and requests, etc.), this data is kept for a reasonable period limited to the accomplishment of the objective pursued during its collection, including for the minimum amount of time necessary to perform the technical measures necessary to delete or anonymise your data.

7. How do we use cookies?

When you use our websites, we place "cookies" on your computer. A "cookie" is a small file sent by our server to the hard disk of your computer, tablet or smartphone that helps the site remember information about you and your preferences.

We use different types of cookies:

- a. "Strictly necessary cookies and functional cookies": for instance, they allow us to identify your country and the language you prefer to use, to make the use of our site as simple and pleasant as possible;
- b. "Performance cookies": they allow us to collect traffic statistics from our site to make it more user-friendly and to offer content better suited to your needs;
- c. "Commercial cookies": they allow us to propose offers to you that are tailored to your interests. However, this type of "cookie" will only be installed on your computer if you have consented to it.

You may refuse to install "cookies" on your computer, but such a refusal may result in decreased functionality or slow-down, or may even prevent access to certain services on the site.

Please bear in mind some cookies are deleted when you close down your browser (session cookies). Others remain on your device until they expire or you delete them from your cache (persistent cookies) and enable us to remember things about you as a returning visitor. Our cookies also enable us to tailor the content you view according to preferences you set.

8. Will this Privacy Policy change?

Legal obligations are constantly evolving, hence we draw your attention to the fact that this Privacy Policy is subject to change.

We therefore invite you to regularly consult the latest online version of this Policy and we will inform you via the website or through other usual channels of communication (for example, by e-mail) of any substantial changes to the current Privacy Policy.