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Respecting privacy and personal data is a priority and constant concern for the iNNERSHIP company, which follows a "Privacy by Design" approach. This implies, in particular, that your personal data is protected by default with regards to both to our system design and practices. Our processing operations are done with transparency and in accordance not only with existing laws and regulations, but also with this Charter. We ensure end-to-end privacy protection, from the design of the application to the deletion of personal data.

iNNERSHIP, in accordance with European standards for personal data protection, ensures a high level of protection to all its customers and users regardless of their country of origin and, subject to legal and regulatory obligations, regardless of the place from which they access the services.

## Our principles, our ethics

Our ethics on privacy and personal data protection are based on the following principles:

- **Transparency and fairness:** You know what information is collected, by whom, how, and for what uses. You can also, at any time, contact us to request details about our processing operations.
- **Consent:** Data is processed with your express, free and informed consent.
- **Your interests are always prioritized:** We take strict and implicit measures to protect the privacy of customers and users, particular with regards to data and including as it relates to ergonomics and overall user experience.
- **Accountability:** Whenever someone accesses your data, the activity is recorded and the person can thus be held accountable.
- **Proportionality and legitimacy:** Our method of processing personal data tends towards data minimization. We only process information that is useful for the

fulfillment of specific, explicit and legitimate purposes. Also, we only retain that information for a limited period of time.

- **Anonymity:** As soon as it is no longer useful to have information in an identifiable form, it is deleted or made anonymous.
- **Relevance and accuracy:** There are procedures in place and available at all time to users for updating and correcting information.
- **Security and confidentiality:** We take all necessary precautions to make sure data is secure and, in particular, to prevent it from being distorted, damaged, or accessed by unauthorized third parties.

## Some definitions

- **Personal data:** This is data that directly or indirectly identifies you. It will be referred to hereinafter as either “Personal Data” or “Data.”
- **Sensitive data:** This is data that directly or indirectly reveals the ethnic origins, political, philosophical or religious opinions, or union affiliation of people, or that relates to health or sexuality. **We never process sensitive data.**
- **Processing of personal data:** Any operation carried out by any means whatsoever relating to personal data.
- **Controller:** This is the person who decides on the purpose and means of processing, to be referred to hereinafter as "the Manager."

## Who is responsible for your data?

The data Controller is the company iNNERSHiP SAS, located at Résidence Château Levat, 188 rue Alfred Cortot, 34000 MONTPELLIER, FRANCE, and registered with the Registre du Commerce et des Sociétés de Montpellier under the number 811 488 113.

Its representative is: Thomas d’Hauteville, President of iNNERSHiP.

Understand that personal data processing is considered to be a company asset that can thus be transferred in the case of a sell-off. In such a case, unless you expressly consent, you will retain the benefit of this Charter.

## What do we do with your information?

Professional growth is a personal and intimate subject, something that is unique to each individual. Each user is free to discuss personal matters and answer the questions he or she wants. The personal information that is collected helps users develop their ideas and, more generally, allows them to benefit from the best possible services. The data processing is used, in particular, to help you plan your professional projects and dreams and put them into practice, to identify your preferences, your strengths and possible limits, and ultimately to develop your potential.

*We guarantee the strictest confidentiality regarding your data, which is made anonymous as soon as the information has served its purposes.*

The processing of data may be done as well in the context of a teaching activity, professional mobility or coaching.

We also process personal data in order to improve our services. To this end, we can use it to compile statistics and practice segmentation to offer you services best suited to your needs. If you give prior consent, we may occasionally use a portion of our newsletter to inform you of developments in our various services. We can also inform you occasionally of promotional offers. Users no longer wanting to receive these offers can refuse them at any time, and we will immediately stop sending them.

## **What information do we process?**

We process the following information: email and username (pseudonym), country of residence, and preferred language. In the context of a company, university, school or institution, we process the name of the company, university, school or institution concerned and, in some cases, the specific department, sector or section.

We collect information that is provided when people use our services, starting when they first create an account. You are always free to choose what information you want to disclose. Keep in mind that iNNERSHiP processes this data to provide you with the best possible service and that we guarantee strict confidentiality. Be aware too that your employer does not have access to the information in question.

Other personal information may be directly generated through the use of electronic communication networks. This includes, for example, your “internet protocol” address, the date and time of your connections to the iNNERSHiP application, the type of browser used, the operating system of the device with which you connect, etc. This information allows us to follow your progress in the application and thus constantly improve the quality of the service we provide and better adapt to your specific needs.

This information is also useful for prevention and diagnostic purposes. In addition, we use connection “cookies.” Further along in this Charter we detail how the cookies function and how they can be deleted.

When the device from which you are connecting to the application allows it, we may use so-called “geolocation” information. We remind you that you can deactivate the localization function on your device at any time and thus avoid having this data processed. In such cases, we can also process the unique identifier of the device (IMEI / MEID, CDN, ICCID etc.).

## **Who has access to your information?**

The data that individuals enter when using the application belongs to them. The only people likely to have access to that information are the people you yourself have chosen to invite to assist in your project. For example, when you invite a companion to iNNERSHiP, they will receive an email that contains the email address you signed up with as well as the pseudonym you use on iNNERSHiP.

Under no circumstances will a company, university, school or institution that offers you this service have access to your personal data. Nor will school administrators or any people of

authority in a workplace or institution be able to access personal information that you share through the application.

## **How long before your information is erased?**

Our managing departments do not keep personal data beyond the period of employment, schooling or contractual relationship with a coach of the person concerned, without prejudice to legislative or regulatory provisions specific to certain categories of data requiring a specific retention period or deletion of such data. This is, for example, the data necessary to establish proof of a legal right or a contract, which can be archived in accordance with the legal provisions in force and any probative needs. Subject to the aforementioned provisions, the information is deleted one year after the contract ends.

Personal data used for sales purposes (companies or universities) are only kept for the period during which they are necessary for carrying out canvassing operations.

## **What are your rights?**

By entering your data, you acknowledge having read this Charter on data protection and privacy and you consent, without reservation, to its application.

## **How can I access my information?**

Upon proof of identity, you have a right to access information concerning you. In particular, you can ask for confirmation that we are processing information concerning you, and request additional information relating to:

- The purpose(s) of the data processing.
- The categories of personal data processed and the recipients or categories of recipients with whom the data is shared.
- Where applicable, information relating to transfers of personal data planned for a non-member state of the European Community.

To access your information, you must connect to your account using your login and password, then click on the “Profile” menu and select “Settings.”

## **How do I correct and update my information?**

To modify and update your information (changing an email address, pseudonym, the frequency of email notifications, etc.), you must connect to your account using your login and password then click on the “Profile” menu and select “Settings.”

## **How do I delete my information?**

You have the right to object to the use of your our personal data for commercial prospecting purposes. As such, you can request that the information be deleted within the limits of legal retention obligations and limitation periods.

You can exercise your rights and ask any question regarding privacy and personal data protection by writing to iNNERSHiP SAS at the following address: Résidence Château Levat, 188 rue Alfred Cortot, 34000 MONTPELLIER, FRANCE.

Always make sure to include in this letter a proof of identity. By doing so, the person making the request can prevent a third party from usurping the former's identity and sharing or destroying his or her personal data.

iNNERSHiP does not transfer your data to countries that are outside the European Union, are not members of the European Economic Area, or have not been formally recognized by the European Commission as meeting basic protection standards.

## **We guarantee the confidentiality, security and integrity of your data**

We take all necessary precautions to keep your personal data secure and, in particular, to prevent it from being distorted, damaged or accessed by unauthorized third parties.

## **The key to keeping control over your data is consent**

In accordance with the information provided by this Charter, you acknowledge having given your express, free and informed consent to the Processing of Personal Data described therein. This Charter is part of the general conditions that govern our services. By accepting our general conditions, you expressly accept the provisions of this Charter. We draw your attention to the fact that the Charter is accessible through our mobile application and that the installation and use of the iNNERSHiP mobile application implies full consent to this Charter's conditions.

## **iNNERSHiP and advertising**

Although iNNERSHiP does not, at this time, include advertisements in its application, it reserves the right, unless you object, to use your personal data to eventually offer ads that are customized to your needs and interests and thus have a real added value. For this purpose, we may, in particular, rely on data you provide while using the iNNERSHiP application. We do not share your data with advertisers or third parties.

## **Managing "cookies"**

While browsing our site <http://www.innership.com>, your web browser may be required to create cookies. This is a text file (.txt) in which certain information is stored, including your display preferences or your connection terminal (computer, smartphone, tablet, etc.). The goal is to facilitate and improve your browsing experience on the iNNERSHiP site.

It may happen, in the case of eventual advertising, that third-party sites also create "cookies" for you. A cookie is a commonly used tool on the internet and we are only responsible for cookies identified as originating from the <http://www.innership.com> site.

We ensure as much as possible that these third-party sites strictly respect your right to privacy in accordance with the laws and regulations in force.

On your connection terminal, you can view and delete all connection cookies at any time.

You can also configure your web browser to be informed as soon as a cookie is created, and set up automatic rules defining a specific a policy with regards to cookies.

The following tutorials for managing and deleting cookies are up to date as of 08/24/2015, but may change at the discretion of the software vendors:

### **Internet Explorer**

To manage your cookies with Internet Explorer, choose the “Tools” menu, then “Internet Options.”

In the “Internet Options” window, under “Privacy” click on “Settings.”

Then click on “Options” followed by “History” and finally “Cookies.”

#### **To block third-party cookies**

Third-party cookies are usually not necessary to take advantage of the resources available on the internet. To limit your browsing trail, it is recommended that you refuse them by default.

Go to “Menu” and choose “Internet options.” Click the “Privacy” tab and set it to “Medium High.” This will block all third-party cookies

#### **Limit tracking in Adobe Flash**

The Flash software component is configured by default to record information allowing the Internet user to be traced.

It is recommended that you change these settings by logging into the online settings manager.

You must configure the privacy settings for each of the eight (8) tabs.

### **Firefox**

In the “Firefox” menu at the top left of the window, choose the “Preferences” menu:

In the “Privacy & Security” tab, click on “Cookies and Site Data.”

You can then choose what information to delete.

#### **Block third-party cookies:**

Third-party cookies are usually not necessary to take advantage of the resources available on the internet. To limit your browsing trail, it is recommended that you refuse them by default.

In the Firefox browser:

Menu> Preferences> Privacy & Security tab

Under “Enhanced Tracking Protection” select “Custom.”

Finally, select “All third-party cookies” from the drop-down.

### **Prevent the installation of trackers:**

**There are many Chrome extensions to block the different trackers.**

- [DoNotTrackMe](#): A simple extension blocking trackers.
- [Disconnect](#): A very complete extension that blocks trackers and offers advanced features. We highly recommend it.
- [Ghostery](#): An excellent extension for blocking trackers.
- [Adblock](#): AdBlock goes beyond just privacy protection and also blocks advertisements, including non-personalized ones, before they appear in your browser. However, these advertisements help fund sites, especially those that offer free services to the user. Therefore, this solution is recommended only as a last resort.

### **Sharing on social networks... or not:**

When you visit sites where social network buttons are present, those platforms are informed of your visit. Assuming you do not want to share the site you are visiting, it is therefore recommended to block this tracking. Blocking social network buttons such as Facebook and Twitter can be done using a free software extension such as [ShareMeNot](#).

### **Google Chrome**

Go to the menu at the top right of the browsing window, click on “More Tools” then on “Clear Browsing Data.”

You can then delete cookies:

Block third-party cookies:

Menu> Settings> Show Advanced Settings (located at the bottom of the settings screen).

You must then click on the “Content settings” button then check the box “Block third-party cookies and site data.”

### **Prevent the installation of trackers:**

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### **Safari**

IN your browser choose the Safari menu, followed by “Preferences” and then “Privacy.” Then click the “Manage Website Data” button to show cookies.

### **For other browsers and mobile devices:**

If you wish to restrict the use of cookies for another browser or on a mobile device, go to the official web page of the browser or the manufacturer of the device or consult the documentation provided with it, then follow the instructions.