



SémioConsult Data Privacy Policy

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1. Introduction

In accordance with the General Data Protection Regulation (GDPR), applicable since 25 May 2018, SémioConsult's aim in this Data Privacy Policy is to explain in a transparent way how the personal data collected during its activities are used.

The purpose of this Policy is to:

1. Explain which personal data we collect, for what purposes we collect and use them, and with whom we share them.
2. Set out your rights and choices regarding the personal data we collect and process and explain how we protect your personal data.

We hope this Policy will help you understand our commitments to protecting your privacy. For any questions or issues, please refer to section 5 “Contact us” below.

2. Legal basis for data collection at SémioConsult: what data are collected, how are they collected and how do we use them?
 - a. What data are collected? Through which channels?

The type of data collected depends in part on the services we provide. They correspond to the information provided in the context of a consulting or training contract, or when subscribing to a newsletter.

Category of personal data	Description
Data collected as part of entering a consulting service contract	Data collected as part of entering a consulting service contract These are the data provided in the course of SémioConsult’s brand strategy, image and brand DNA consulting activities, and more specifically in the contract signed between the client and SémioConsult. These data include last name, first name, job title, company, email address and geographical location (city).
Data collected when registering for a training course provided by SémioConsult	These are the data provided when registering for a SémioConsult training course. They include last name, first name, job title, company, email address and geographical location (city).
Data collected via the online newsletter subscription form	These are the data requested in the online subscription form (on our website) for our newsletter. These data include an email address, last name and first name, country or city of residence, the language in which the subscriber wishes to receive the newsletter

	<p>(French, English, Italian), job title and company, as well as the subscriber's interests (Fashion, Luxury, Tourism, "Made in France", Counterfeiting) so that we can send them relevant newsletters. Mandatory fields are email address, last name and first name, country of residence and interests. The country or city of residence is collected to segment our contacts by place of residence and adapt the content of our newsletters. We can therefore communicate about events taking place near their place of residence or work.</p>
<p>Data collected when subscribing to the newsletter directly via the organisation by handing over a business card</p>	<p>These are the data appearing on the business card given directly to a representative of SémioConsult for the purpose of subscribing to the newsletter. They include a last name and first name, an email and/or postal address, as well as the job title and company of the card holder. This information is recorded after the card has been handed over by the person and following an explicit request to a representative of SémioConsult for these data to be recorded for the purpose of subscribing to SémioConsult's newsletter. The country or city of residence is collected to segment our contacts by place of residence and adapt the content of our newsletters. We can therefore communicate about events taking place near their place of residence or work.</p>

The data are collected in the following ways:

- When entering a consulting service contract with SémioConsult.
- When registering for a training course provided by SémioConsult.
- When subscribing to SémioConsult's newsletter on the website, or directly with management or an employee of SémioConsult by handing over a business card, in which case the information shown on the business card is collected.

b. How do we use this data?

The table below explains how your data are used depending on the context in which you provided them, in compliance with Article 6 of the GDPR on the lawfulness of processing.

Description of the purpose for which SémioConsult processes your personal data (“purpose of processing”)	Legal basis for the purpose of processing	Categories of personal data used for this purpose
Carry out the commissioned study relating to the structure of a company, its employees or its social networks, and send the conclusions.	<ul style="list-style-type: none"> • Performance of a contract 	<ul style="list-style-type: none"> • Data provided in a contract with SémioConsult
Send you the training invitation and program, your end-of-training evaluation results and the certificate to which you are entitled at the end of the training. Send a satisfaction questionnaire.	<ul style="list-style-type: none"> • Performance of a contract 	<ul style="list-style-type: none"> • Data provided when registering for a SémioConsult training course
Communicate with you in connection with your subscription to our newsletter. We tailor each email according to the interests and geographical location you have communicated to us.	<ul style="list-style-type: none"> • Consent 	<ul style="list-style-type: none"> • Data provided when subscribing to the newsletter via the online form; data collected from a business card given directly to a representative of SémioConsult for

		the purpose of newsletter subscription.
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3. How are data stored and for how long?

The data you entrust to us are stored in SémioConsult's secure files. These data are not intended to be transferred outside the country in which SémioConsult is established, namely France.

They are not publicly available, and their use is strictly limited to SémioConsult's management and employees. These data are kept for as long as SémioConsult has the consent of their owners to retain them, or for the duration necessary for the performance of the contract and the fulfilment of legal obligations, where applicable.

4. Your rights and choices regarding the personal data collected

Subject to the limitations laid down by applicable law, you have the following rights, where available:

- Right of access: the right to be informed and to request access to the personal data that we process about you.
- Right to rectification: the right to ask us to amend or update your personal data where they are inaccurate or incomplete.
- Right to erasure: the right to ask us to permanently delete your personal data.
- Right to restriction of processing: the right to ask us to temporarily or permanently stop the processing of all or part of your personal data.

- Right to object: the right to object at any time to the processing of your personal data for personal reasons; the right to object to the processing of your personal data for direct marketing purposes.
- Right to data portability: the right to request a copy of your personal data in electronic format and the right to transmit these personal data for use by a third-party service.
- Right to lodge a complaint with the CNIL: the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) if this privacy policy is not complied with.

To help you exercise these rights in connection with SémioConsult's use of your personal data, we invite you to contact directly our Data Protection Officer, whose contact details are listed in section 5 of this document, or, for any complaint, the CNIL. If you wish to stop receiving SémioConsult newsletters by email, you can unsubscribe directly from the last email received by clicking on "unsubscribe" at the bottom of the email. The software will immediately process your request, and you will be permanently removed from our contact database.

5. Contact us

For any further questions you can contact SémioConsult at the following address:
SémioConsult - Chalet des Roses - 101 Boulevard des États-Unis - 03200 VICHY - France

In accordance with the GDPR, you can contact directly our Data Protection Officer:

Ms Anne-Flore Maman Larraufie - anne-flore.maman@semioconsult.com