



PERSONAL DATA PROTECTION POLICY

OPCO 2i

Applicable on October 23, 2023

PRELIMINARIES

The terms used in the upper case shall have the meaning defined in this Personal Data Protection Policy.

1	DATA SUBJECTS	2
2	DATA CONTROLLER	2
3	CONTACT DETAILS – DATA PROTECTION OFFICER	2
4	OBJECTIVES AND LEGAL BASIS OF THE PROCESSING	2
5	DATA RECIPIENTS.....	2
6	CATEGORIES OF PERSONAL DATA PROCESSED BY OPCO 2i	3
7	UNSUBSCRIPTION FROM COMMUNICATIONS	3
8	RETENTION PERIOD.....	3
9	COOKIES AND OTHER TRACKERS	3
10	USER RIGHTS.....	4
11	UPDATES	4

1 DATA SUBJECTS

In the context of this Personal Data Protection Policy, the data subject shall mean any person whose personal data is processed by OPCO 2i in the context of its missions for the collection, mutualization and redistribution of companies' financial obligations for the professional training in the industries.

The following personal data is collected and processed:

- Individuals acting on behalf of companies under OPCO 2i's area of competence and in contact with OPCO 2i;
- The persons eligible to pursue training under OPCO 2i's area of competence, or registered or having validated such training (the training beneficiaries);
- Individuals acting on behalf of training bodies and any other commercial or institutional partner of OPCO 2i.

2 DATA CONTROLLER

The Data Controller is OPCO 2i, inter-industry skills operator, with its registered office located at 23 rue Balzac, 75008 Paris.

Email: rgpdcontact2i@opco2i.fr

3 CONTACT DETAILS – DATA PROTECTION OFFICER

For any information concerning the personal data processing implemented by OPCO 2i contact:

OPCO 2i : 23 rue Balzac, 75008 Paris

Email: rgpdcontact2i@opco2i.fr

4 OBJECTIVES AND LEGAL BASIS OF THE PROCESSING

OPCO 2i is an inter-industry skills operator. OPCO 2i makes available management tools to inter-industry regional associations and delegates the implementation of all the statutory, conventional and voluntary mechanisms, for the development of guidance and professional training throughout the employees' activity, on behalf of companies which fall within OPCO 2i's professional status, in accordance with its latest ministerial accreditation order. The collection and processing of personal data by OPCO 2i and its officers shall be made in accordance with Articles L6332-1 *et seq.* of the French Labor Code:

- to enable the collection of ongoing professional training funds and the apprenticeship tax;
- to enable the financing of the beneficiaries' training;
- to enable OPCO 2i to provide the training given by the professional training bodies and, as the case maybe, the related costs;
- to enable the management of the relations with the users of its services;
- to fulfill its legal obligations to share information between the actors of professional training;
- to allow the management of requests for public subsidies allocated to the financing of professional training for the benefit of the employees of the companies which fall within the professional field of competence of OPCO 2i, as well as their payment and the follow-up of their attribution.

OPCO 2i shall also process the individual suppliers' personal data, personal data relating to individuals acting on behalf of the suppliers when such suppliers are legal entities, individual training personal data and individuals acting on behalf of training bodies for training legal entities and commercial or administrative partners, in the context of current business relations with these partners in performance of agreements or pre-contractual relations, or for the purposes of referencing in OPCO 2i's legitimate interest.

OPCO 2i also processes the personal data of its various correspondents in order to communicate with them and send them promotional advertisements, at the data subject's discretion. The legal basis for this processing is, depending on the case, the data subject's consent, the performance of contracts or pre-contractual measures, the performance of statutory and regulatory obligations and OPCO 2i's legitimate interest to promote its activities.

Furthermore, OPCO 2i is obliged to retain certain data in order to meet its statutory and regulatory obligations.

OPCO 2i also has a legitimate interest to retain certain data in order:

- to ensure the security of its services;
- to improve and customize the services offered and customize the information sent to the data subjects; - to meet the supervisory requirements (DGEFP, Direccte, Cour de Comptes...).

5 DATA RECIPIENTS

Depending on its missions, OPCO 2i may be required to transfer personal data to training bodies, companies to which the training beneficiaries are attached and also certain State bodies such as the general delegate for

employment and professional training (DGEFP) and the regional directorates for companies, competition labor and employment (*Direcctes*).

For the training financed in full or in part by the European Social Fund (ESF), the Regions, *Pôle emploi* (French Unemployment Benefits office) and the bodies participating in the financing of the training, such bodies are recipients of personal data concerning the beneficiaries of such training.

As the case maybe, OPCO 2i may have recourse to sub-contractors for the implementation of this processing, in accordance with Article 35 of the Data Protection Act dated January 6, 1978 and Article 28 of the General Regulation for Data Protection.

6 CATEGORIES OF PERSONAL DATA PROCESSED BY OPCO 2i

OPCO 2i shall process the following personal data of the employees of the subscribing companies which is communicated by the latter, or provided directly by the beneficiaries of the training:

- Information concerning the identity of the employee eligible for the training (name, first name, maiden name, civil status, date of birth, country of birth, town of birth, nationality, NIR (identification number), indication of a handicap);
- Professional information: establishment of the subscribing company, type of contract, information concerning the remuneration, status in the company, level of initial training, CV, social minima, vocational schedule, professionalization period, training plan, letter of motivation.

OPCO 2i shall process the following personal data for the training beneficiaries, communicated by the training bodies:

- Information concerning the training beneficiary's identity (name, first name);
- Information concerning the training pursued (in particular, the training body, title of the training, duration, cost, attendance certificate).

OPCO 2i also processes professional contact details (name, first name, position, company or professional body, professional email address, professional telephone number) of the following:

- contacts in the company (individuals);
- training bodies;
- suppliers or commercial or administrative partners in business relations with OPCO 2i.

For the persons who have access to the services portal, the following personal data is also processed: login I.D., password, connection data.

7 UNSUBSCRIPTION FROM COMMUNICATIONS

A person recipient of OPCO 2i's informative communications may decide to unsubscribe from OPCO 2i's communications at any time, even if it had expressed otherwise beforehand:

- either by clicking on the unsubscribe link included on such communications;
- or by modifying the choice settings on the personal account or by formulating a request by sending an email or by writing to the postal address mentioned in Article 3 (contact details).

8 RETENTION PERIOD

OPCO 2i shall only retain the data for the period necessary for the purposes mentioned above or in accordance with the applicable statutory provisions, in particular, in the event of a dispute.

Accordingly, the information concerning the beneficiaries of the training provided by OPCO 2i is retained for a maximum period of 10 years as from the close of the year during which the file was processed.

The information concerning the professional contact details of OPCO 2i's professional correspondents shall be retained for the duration of the business relations with OPCO 2i.

The data exchanged via the Personal Training Account Information System (SI-CPF) is kept for a period of three years after the death of the account beneficiary.

9 COOKIES AND OTHER TRACKERS

A "cookie" is a text file that may be filed on a webuser's terminal following a visit to a website by the server of this site. The purpose is to collect information relating to the webuser's browsing and to send him appropriate content to his terminal or content corresponding to his interests. Only the cookie issuer is able to read or modify the information included therein.

The cookies' purpose is as follows:

- to establish statistics and attendance volumes and use of the various elements comprising our online services, website and services portal, (number of pages visited, number of visits, activity, return rate, etc.), in order to follow and improve the quality of our services;
- to adapt the presentation of our online services to the terminal display preferences (language, display resolution, operating system, etc.);
- to facilitate the use of the online services, for example, by memorizing the information relating to a form or information selected on the online services in order to provide content in relation with the interests for OPCO 2i's activities.

OPCO 2i may read the information stored in such cookies during subsequent visits by the webuser.

The data relating to the webusers' cookies is retained for a duration of 13 months as from their collection.

The webuser may object to the registration of cookies by setting his browser. In the event of setting related to the use of cookies, certain services proposed may no longer be accessible or functional, for which OPCO 2i may not be held liable.

10 USER RIGHTS

Depending on the services, the data subject may update his personal directly in his space on the service portal with his login ID and password.

Each person has a right of access, rectification, deletion, limitation, objection, portability of his data or removal of his consent within the conditions and limits provided by the European General Regulations on data protection. The user of OPCO 2i's services may also define the directives relating to the use of his data after his demise in accordance with Article 48 of the Data Protection Act.

A person may exercise his rights at any time by contacting the personal data protection service by sending an email to the following address: rgpdContact2i@opco2i.fr or by writing to the postal address mentioned in Article 3 (contact details).

To ensure the respect of the confidentiality and protection of the personal data, OPCO 2i shall require the data subject to communicate his identity in order to meet this request. To do so, the data subject shall be requested to attach the copy of an official identity document, in support of his claim, such as a valid identity card or passport.

All the requests shall be processed as soon as possible and in compliance with the applicable law. In certain cases, the personal data may only be deleted after a certain period defined by the applicable regulations and the statute of limitations. In such case, OPCO 2i shall retain this data until the total deletion date provided.

The data subject shall be informed that it may not object to the collection and processing of personal data, the processing of which shall be made by virtue of OPCO 2i's statutory obligations. The data subject shall also be informed that, in the event of refusal to provide his personal data or exercise his right of withdrawal or objection, all or part of the services proposed may be rendered inaccessible.

In the event of a dispute with regard to the use of his data, the data subject shall be entitled to file a complaint before the French National Data Protection Commission (CNIL).

In particular, with regard to the processing of personal data within the framework of the personal training account information system (SI-CPF), the data subject is informed that he or she may not object to the processing of his or her personal data, and in particular his or her NIR, and that his or her rights of access and rectification may be exercised at the Caisse des dépôts et consignations.

11 UPDATES

OPCO 2i may modify this policy periodically.

The user of OPCO 2i's online services shall be informed of the modification by any means, such as, in particular: an email or failing that, by notification on OPCO 2i's online services.

The applicable version of this policy is always accessible on OPCO 2i's website and services portal.