



GENERAL PRIVACY AND DATA PROTECTION POLICY

For the Institut International de Lancy (the « **Institute** »).

1. INTRODUCTION

1.1 This declaration on the Institute's general privacy and data protection policy (the "**Declaration**") forms an integral part of the Institute's general conditions and governs the entirety of the services offered by the Institute to all of its students, their parents, legal representatives and other relevant users (hereinafter the "**User**" or "**You**", the term "**Your**" hereinafter directly referred to the User).

1.2 Your personal data is very important to the Institute, which undertakes to do its utmost to protect the personal data that the Institute collects, processes or uses when offering and providing its services to the User. This Declaration details, among other things, the objectives and principles underlying any treatment of Your data, the obligations of the Institute and Your rights in this regard. Any collection and processing of personal data is carried out confidentially and in accordance with applicable Swiss and European legislation, particularly the European Data Protection Regulation (GDPR) and the Federal Data Protection Act (DPA).

1.3 The Institute reserves the right to modify, at any time and without notice, this Declaration and all documents and related information provided to the User or otherwise freely made accessible by the User.

2. PERSONAL DATA COLLECTED

2.1 The Institute processes the personal data that You voluntarily provide to it, in particular by contacting the Institute (by e-mail, mail and any other available means), by registering Your children, by filling out a form for the Institute, in applying for a job, accepting an offer of employment, participating in a survey or subscribing to any services offered by the Institute.

2.2 Personal data that may be collected and processed by the Institute include the following: surname, first name, nationality, email, telephone, address, country, field, degree level, work permit, documents such as CV, letter of motivation and diplomas.

3. PROCESSING OF PERSONAL DATA (ART. 6 GDPR)

3. 1 The data collected by the Institute are used globally to improve the quality of the services offered by the Institute and as agreed upon by the User. In this regard, the Institute creates and processes files containing the personal data of its students in order to efficiently process their registration and admission to the Institute as well as to manage their curriculum and any subsequent contractual relationship with the User, its legal representatives and all other persons concerned. The Institute proceeds in the same way with regard to candidates for employment within the Institute and Institute employees as part of the recruitment process and the management of the subsequent employment relationship.

3. 2 Access to the User's data is limited to internal use (employees or agents of the Institute). The Institute does not use the data collected for purposes other than those mentioned in this Declaration or in other similar documents posted on the Institute's website or given to the User. The Institute may transmit personal data to outside contractual partners such as service providers or processing agents designated by the Institute for the possible execution of the services offered by the Institute and other related services. Any external contractual service provider of the Institute is subject, in its contractual relationship with the Institute, to the same confidentiality requirements and obligations as the Institute guarantees to Users. The Institute does not disclose the personal information of Users to third parties unless the User concerned has given his consent or if a legal provision allows, or even requires.

3. 3 The Institute shall establish and maintain a register of processing activities (art. 30 GDPR) including the following information: (i) the name and contact information of the controller, (ii) the purposes of the processing, (iii) a description of the categories of data subjects and categories of personal data, (iv) the categories of recipients to whom the personal data have been or will be communicated if appropriate, and (v) as far as possible, a general description of the technical and organizational security measures put in place by the Institute.

4. DURATION OF THE PROCESSING OF PERSONAL DATA

4. 1 Your data is retained and processed as long as is necessary to fulfill the legal and contractual obligations of the Institute except in a case mentioned in art. 5.1 below.

5. YOUR RIGHTS

5.1 Any User has a right of access to its personal data processed by the Institute. It also has a right of rectification, a right of cancellation ("right to be forgotten"), a right to the limitation of treatment, a right of opposition, if any, a right of portability, as well as the right to lodge a complaint. Any request to this effect must be communicated to the Institute's data protection service, the contact details of which are indicated in art. 6 of this Declaration.

5.2 The User may at any time withdraw his consent for the processing of his personal data. However, the Institute draws the attention of the User that in case of withdrawal of consent or in the case of a request for a limitation of processing, some services of the Institute may no longer be available and delivered to the User.

5.3 It is important that the data processed by the Institute are complete and up-to-date and it is the sole responsibility of the User to ensure that the data provided to the Institute and processed by the Institute are correct. It is the User's responsibility to inform the Institute of any changes.

6. CONTACT

6.1 Within the limits of the applicable legal provisions, all questions and requests of the User relating to the processing of its data by the Institute or relating to the exercise of a right listed in art. 5.1 should be addressed to the Institute's data protection service as follows:

- by mail: Répondant en matière de protection des données
Avenue Eugène Lance 24
1212 Lancy
- by email: dpo@iil.ch

6.2 The data protection service of the Institute responds to the request of the User within one (1) month, which is extendable (at its request before its expiry) to two (2) months in the case of complex requests or due to the number of requests to be processed.

6.3 In the event that a User wishes to lodge a complaint before the supervisory authority, the User must lodge such a complaint with the Federal Data Protection and Information Commissioner FDPIC for Switzerland and, if the User resides in the European Union, to the supervisory authority of his country of residence. The User

will have been sure to contact the Institute first to try to remedy the situation amicably.

6. 4 This policy has been written in French and English. In case of divergence between the two versions, the French version serves as reference and is legally binding.

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