

Privacy Policy

1/01/2021

Acolad in its capacity of "data controller", guarantees that it processes Personal data in compliance with all legal provisions related to the protection of Personal data and, in particular, with the General Data Protection Regulation (UE) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR").

This Privacy Policy supplements any information you have already been given on this subject. Furthermore, Acolad may provide you with additional information to address specific circumstances (not covered by this Privacy Policy) in which your Personal data may be collected and processed.

The word "you" shall mean anyone, wherever located, who falls within the scope of this Privacy Policy. "Personal data" shall mean any information relating to an identified or identifiable natural person. "Us/we" shall mean Acolad

What data do we collect?

Acolad may collect the following data:

Personal Identification Information (name, email address, phone number, etc.)

How do we collect your Personal data?

Acolad may collect Personal data:

- Through public sources for Acolad services presentation campaigns or prospecting activities (in legitimate interest),
- You contact us to request information (such as on our products and services),
- You visit and take some actions in our website (www.acolad.com) or in Acolad public platforms like:
 - You register to our online seminars through the learning store,
 - You submit a request for quotation,

- You register to our newsletter,
- You apply to become part of our international network of expert vendors (including external translators and interpreters) (hereinafter “Vendors Network”),
- You are given access to our client portal.

Processing of your Personal data

Acolad processes only necessary data relating to the processing purposes and with respect to the data minimization principle.

The Personal data we collect does not lead to an automated decision-making within the meaning of Article 13.2 (f) of the GDPR.

The Personal data collected are for the exclusive use of Acolad and its affiliate companies which may be involved in the provision of the services, may perform data processing on Acolad’s behalf or for data centralisation purposes.

For technical reasons, Acolad may outsource some services to providers (such as hosting providers, IT solution providers...). Acolad will not sell your information to third parties.

Acolad may also be requested to communicate your information to administrative and judicial authorities to comply with its statutory obligations.

Third parties to whom we transfer your Personal data are responsible for their compliance with the applicable data protection legislation.

Transfer of Personal data outside the EEA

Wherever possible, your Personal data is processed within the European Union (EU)/European Economic Area (EEA)/United Kingdom. Acolad may, if necessary, transfer your Personal data to a third country or to an international organization located outside these territories.

In such case, Acolad ensures that it takes all necessary and appropriate measures to comply with the applicable law, by:

- Transferring data to countries and international organizations which are subject to an adequacy decision issued by the European Commission,
- Transferring data to recipients who have signed the Standard Contractual Clauses established by the European Commission.

Retention period

Acolad does not retain your Personal data any longer than necessary for the purpose for which they were collected, unless Acolad is legally obliged to retain your Personal data for a longer period.

Data processed	Retention period
Data collected through public sources	3 years from the time of the last contact we had with you, unless you revoke your consent from the first response or or at any other time
Data collected because you contacted us by means that do not include our website and its associated modules	3 years from the time of the last contact we had with you, unless you revoke your consent from the first response or or at any other time
Data collected as part of the subscription to our newsletter.	3 years from the time of the last contact we had with you, unless you revoke your consent.
Data collected via the contact form.	Duration of the processing of the request for information or the time of the exchange.

<p>Data collected for a request for quotation.</p>	<p>Duration of the processing of the request for quotation or the time of the exchange.</p> <p>If such quotation is accepted, the retention period will be the time necessary for the purpose of providing the related services.</p>
<p>Data collected to manage the purchase and registration to online seminars through the learning store.</p>	<p>5 years from the end of the provision of the services.</p>
<p>Data collected to manage your application to our network of translators.</p>	<p>2 years for the last contact we had with you, unless you exercise your right to object to the processing of your Personal data.</p>

<p>Data collected to manage your client portal and offer you services through the portal.</p>	<p>3 years following the end of the commercial relationship, except in the event of a legal archiving obligation or for evidential purposes or accounting obligations.</p>
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Your rights

Acolad will comply with the rights of the data subjects ensuing from the legislation. Under the GDPR, you have the following rights with regard to your Personal data:

- right of access to your Personal data,
- right to rectification or improvement of your Personal data,
- right to be forgotten,
- right to restriction of the processing of your Personal data,
- right to data portability.

When Personal data are processed for communication and direct marketing purposes taking place because of Acolad's legitimate interest, you have the right to object to the processing without having to justify a legitimate interest.

In order to exercise the above-mentioned rights, you can submit a request to Acolad's Data Protection Officer via email at the following address: dpo@acolad.com.

If your Personal data have been processed on the basis of consent, you have the right to revoke this consent at any time.

If you see reason to do so, you have the right, at any moment, to submit a complaint to the French data protection authority (CNIL) located at 3, Place de Fontenoy, 75007 Paris.

Appropriate technical and organisational measures

Acolad implements appropriate technical and organisational measures to ensure the integrity, availability, and security of your Personal data against any loss, destruction, damage, modification, disclosure and against any form of unlawful processing.

Acolad has established technical measures (such as anti-virus and firewalls, etc.) and organisational measures (such as a login/password system, physical protection means, etc.) to ensure the protection of Personal data. Computer workstations are systematically locked and only accessible via a login and password system.

We require our staff and all third parties working for Acolad to adhere to strict security and information protection standards, including contractual obligations to protect all data and to apply strict data transfer measures.

Applicable law

This Privacy Policy is governed by French law. Any dispute will be submitted to the competent courts of Paris.

How to contact us

If you have any questions about this Privacy Policy, please contact us at cgrau@acolad.com.

DPO contact details

Carlos GRAU I PALOU

Via G. Rivani 83, 40 138 Bologna, Italia

DPO@acolad.com or cgrau@acolad.com

Data Controller identity

Acolad's mother entity is NIKITA, a company incorporated under the laws of France whose head office is at 11 Rue Lazare Hoche, 92100 Boulogne-Billancourt, registered at the Trade and Companies register of Nanterre under n° 814 416 822.

1/01/2021

