

INCO GROUP PRIVACY POLICY

1. INCO'S COMMITMENT TO PROTECTING PRIVACY

INCO is committed to protect your privacy online.

Consequently, we comply with all applicable legislation. To achieve a high level of privacy, we have decided to use as standard for all our entities the obligations set by the European Union Regulation n° 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter "GDPR").

This privacy policy (hereinafter "Policy") formalizes our commitments and legal obligations to you and describes how we process your personal data.

2. WHO WE ARE

In this Privacy policy, "INCO" means:

- INCO entities together; or
- The INCO entity you have been in contact with, through its website or by participating to an INCO program. Your data are processed by this entity, excepted in some cases explained in this policy.

Depending on your country, your personal data are processed by the following entity, acting as data controller:

Country	INCO Group Entity	Contact for questions regarding personal data
France	Inco Dorbeljin Inco.org Inco France Inco & Co Inco Ventures Inco FDD	dpo@inco-group.co

Other countries	Inco Dorbeljin Inco.org Inco France Inco & Co Inco Ventures Inco FDD Inco Community gGmbH Inco Community Inc. Inco Ventures Inco Australia Inco Tunisie SARL Inco Polska LLC	dpo@inco-group.co
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3. SCOPE OF THIS POLICY AND DATA PROCESSED BY THIRD-PARTIES

If you are involved in one of our programs, you already know that we work with local partners. In such case, the partner you have been in contact with will process your personal data on our behalf, in accordance with our instructions. However, this partner may also process your data in its own name and on its own behalf. We recommend that you read its privacy policy. Would you have any demand related to personal data processed by a partner we would refer your demand to this partner.

Additionally, our websites may include links towards third party websites or third party plug-in and cookies (see Article 10. on Cookies). These third parties process your personal data for their own purposes and may apply different privacy rules. It is your responsibility to read their privacy policy. We decline all responsibility regarding the processing of your personal data by third parties.

4. YOUR ACCEPTANCE OF THIS POLICY

The use of our services and your participation to our programs implies your full acceptance of this Policy.

We may modify this Privacy policy from time to time. Consequently, we recommend that you consult it regularly.

This Policy will always be accessible on our websites.

5. WHAT PERSONAL DATA DO WE COLLECT?

In accordance with the principle of minimization, we only collect and process the minimal amount of personal data needed. Whenever we can, we limit access to your personal data and implement security measures such as pseudonymization.

Depending on the context, we collect the following personal data:

On participants or applicants to our programs:

- Identification data: e-mail, name and surname, phone number
- Profile data of students: age, gender, education, location.
- Social-economic and/or legal status, depending on the program: employment status, range of income, employment sector, part of underserved community, migration status, etc..
- Special categories of data, depending on the program: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health (including disabilities) or data concerning a natural person's sex life or sexual orientation, trade union membership.
- Information on training progress.
- Communication materials: photographs, video and audio recordings.

On the person making a proposal of partnerships or sharing a job offer with our participants:

- Identification data: name and surname, e-mail, phone number, position held and entity.

On applicants to a job in an INCO entity:

- Identification data: name and surname, e-mail, phone number, address.
- Relevant data regarding applicant qualifications and wishes.

6. WHAT PURPOSES IS YOUR DATA COLLECTED FOR AND HOW LONG DO WE RETAIN IT?

The table below sets out why we process your data, the lawful basis for the processing and the associated retention period:

Objectif / Activité	Base légale	Durée de conservation
Direct application to a program	Legitimate interest to select applicants/Consent if sensitive data are included	1 year
Access and use of online learning platforms	Consent	Program duration
Measuring progress of learners and improve our programs	Legitimate interest to collect data need to improve our programs	Program duration
Understanding the profile of participants	Consent	Program duration
Measuring the social impact of the program	Consent	Program duration
Communication materials for promotion and education purposes	Consent	5 years
Answer your proposition of partnership or share your job offer with participants	Legitimate interest to process your data in order to assess your demand and answer it	3 years
Litigation risk management	Legitimate interest to retain data for the establishment, exercise, or defense of legal claims	5 years

Process application of job applicants	Legitimate interest to select applicants	2 years
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7. RECIPIENTS OF YOUR PERSONAL DATA

Your personal data may be shared internally with our services. In case of need, your personal data may be shared to other entities of INCO.

If you're involved in the Work In Tech Program, your personal data will be also processed by our partner on our behalf.

Your data are also processed by our software providers.

8. PROTECTION OF YOUR PERSONAL DATA DURING INTERNATIONAL TRANSFERS

For the purposes set out in article 6 of this Policy, we may transfer your personal data to internal or external recipients located who may be in countries offering different levels of personal data protection.

Consequently, in addition to implementation of this charter, we employs appropriate measures to ensure secure transfer of your personal data to an INCO entity or to an external recipient located in a country offering a different level of privacy from that in the country where the personal data was collected.

9. DATA SECURITY

We take appropriate technical and organizational measures to protect your personal data against illicit or accidental destruction, alteration or loss misuse and unauthorized access, modification or disclosure.

In particular, we pseudonymize your personal data as much as possible.

10. COOKIES

INCO uses cookies on its websites.

A) What is a cookie

Cookies are small text files sent to your browser by a web server in order to return information to this server.

Cookies ensure smooth functioning of websites or enhance navigation. They may collect information on you and your navigation, which can be personal data. You are warned by a banner displayed on our website that we send cookies to your device, which are then stored on it and remain active for a certain period.

B) Types of cookies

INCO cookies (« first party cookies »): these cookies are sent to your device by our website i.e., by our company.

Third party cookies: this type of cookie is sent to your device by third party entities, with their own web server. By doing so, these entities may collect your personal data. We do not exercise any control over the processing of personal data by this type of cookies. We decline all responsibility regarding the processing of personal data by these entities.

Please find the list of companies that sent third party cookies through our websites and their privacy policy:

- Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Privacy policy: <https://policies.google.com/privacy>

- LinkedIn Corp., 1000 West Maude Avenue, Sunnyvale, CA, 94085, USA

Privacy policy: <https://www.linkedin.com/legal/privacy-policy>

- Facebook, Inc., 1601 Willow Road Menlo Park, CA 94025, USA

Privacy policy: <https://www.facebook.com/about/privacy/>

C) What cookie do we use and why ?

(i) Necessary cookies

Necessary cookies allow you to navigate on our website and access to all our services. Your consent is not required to store this type of cookie on your device.

(ii) Analytics cookies

Analytics cookies are used to collect data that allows us to understand how users interact with our website. These insights allow us both to improve content and to build better features that improve the user's experience.

(iii) Advertisement cookies

This type of cookie will collect data on your navigation and behavior to display to you advertisement based on topics that interest you. Your consent is always required for the storage of these cookies.

D) How can you accept or refuse cookies?

When visiting our website, you can set your cookies preferences to:

- Accept all cookies, or
- Refuse all non-necessary cookies, or
- Accept cookies of your selection.

Setting your preferences may impact your access to services provided by our website. We decline any responsibility over the consequence of your refusal to the storage of cookies.

Your preferences can be set:

- By clicking on the buttons on the cookie banner displayed at your first visit on our website ;
- By setting your choice with our Cookie Consent Manager;
- By setting your browser :

Internet Explorer:

<https://support.microsoft.com/en-gb/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>

Firefox:

<https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>

Safari:

<https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac>

Chrome:

<https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>

11. YOUR RIGHTS

You have the right to obtain information about and access your personal data collected we collect, subject to applicable legal provisions. You also have the right to have your personal data rectified, erased or have the processing of it restricted. Furthermore, you have the right to data portability and to issue instructions on how your data is to be treated after your death. You can also object to the processing of your personal data, subject to legal provisions. If the processing of your data is based on your consent, you also have the right to withdraw your consent at any moment.

We remind you that your personal data are processed in order to answer your demands or to allow you to participate in one of our programs. Without these data, we may not be able to answer your demand and your participation may be hindered or impossible.

In the event that you wish to exercise any of your above rights, please contact us directly:

By sending an email to dpo@inco-group.co.

By writing a mail to the INCO entity you have been in contact with (see art. 2 for the address).

In case of reasonable doubts concerning your identity, you may be asked to provide a copy of an official piece of identification, such as an ID card or passport. All requests will receive a response as swiftly as possible.

If you are not satisfied with the way we process your personal data, you have the right to introduce a complain before the competent data protection authority.