

PRIVACY POLICY OF COACHING ACROSS BORDERS

Data controller

Coaching Across Borders – Fabienne Tailleur SAS, a French société par actions simplifiée with a share capital of 7,000 euros.
Registered office: 44 rue des Envierges, 75020 Paris, France.
SIREN 805 107 323 – SIRET (registered office) 805 107 323 00026 – APE 7022Z.
Contact for any question about this Policy or to exercise your rights: info@coaching-ab.com.

Coaching Across Borders offers coaching and consulting services. Coaching Across Borders may collect personally identifiable information about you ("Personal Information" or "Information") in connection with these services.

This Privacy Policy (the "Policy") describes our privacy practices regarding the collection, use and worldwide transfer of Personal Information collected by Coaching Across Borders in connection with our coaching and consulting services (the "Services"), including Information collected offline and through our web sites, including www.coaching-ab.com and www.blog.fabiennetailleur.com (collectively, the "Site").

By using the Site, you accept the terms of this Policy. If you do not agree with this Policy, do not use the Online Systems.

1. INFORMATION COACHING ACROSS BORDERS MAY COLLECT.

Coaching Across Borders collects Personal Information about you (such as name, e-mail address, postal address and phone number) when you provide it to us, including, for example, when you register to use our Site, provide Information about yourself to our coaches or contact us via e-mail. Coaching Across Borders also collects Personal Information about you from third parties.

In the course of its Services, Coaching Across Borders may also collect the following Personal Information about potential participants: name, citizenship, telephone number, e-mail address, postal address, CV Information (e.g. skills, employment history, professional credentials, memberships in organizations, education), Information from previous employers and other Information to the extent Coaching Across Borders has acquired or the individual has provided Coaching Across Borders with such Information.

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so. You permit us to use the Information in accordance with this Policy.

2. OTHER INFORMATION COACHING ACROSS BORDERS MAY COLLECT.

Coaching Across Borders collects other Information such as:

- Information collected through cookies, pixel tags and other technologies;
- Demographic Information and other Information provided by you; and
- Aggregated Information

(collectively "Other Information"),

Coaching Across Borders and its third-party service providers may collect Other Information in a variety of ways, including:

2.1 From you.

Information is collected when you voluntarily provide this Information.

2.2 Using cookies.

Coaching Across Borders uses "cookies". Coaching Across Borders' cookies are read by Coaching Across Borders' servers only. Coaching Across Borders' cookies cannot execute any code or virus. Coaching Across Borders and its service providers use the Information for security and tracking purposes,

Commenté [A1]: Toutes les données listées permettent l'identification d'une personne concernée sauf les données agrégées / « anonymisées ». Et donc ?

RE: Je souhaite vous informer simplement que les données collectées « other information » doivent être traitées comme des données à caractère personnel conformément à la Loi Informatique et Libertés sauf les données agrégées qui ne tombent pas dans le champ de cette loi.

Commenté [A2]: L'utilisation de cookies sur votre site internet doit faire l'objet d'un consentement exprès, clair et non équivoque (ce consentement pouvant même être donné pour certains types de cookies uniquement par le biais du paramétrage). Le consentement est le plus souvent recueilli par le biais d'un « bandeau ». OK, donc ça c'est à faire par mon programmeur IT, n'est-ce pas ? Et en conséquent, on enlève ce paragraphe de la Privacy Policy ?

RE: Non - il est nécessaire, en plus du bandeau, de conserver les paragraphes de la Privacy Policy relatifs aux cookies.

to display Information more effectively, to facilitate and personalize your navigation experience while using the Site. Coaching Across Borders also gathers statistical Information about the usage of the Site in order to understand how the Site is used, improve the design and functionality and resolve questions regarding the Site.

You can configure your browser to automatically decline cookies, or be given the choice of accepting or declining the transfer to your computer of a specific cookie or cookies from a specific site. However, if you decline these cookies, you may experience some inconvenience when using the Site.

2.3 Tracking data.

Coaching Across Borders logs "Tracking Data" in order to monitor visitor navigation patterns through the Site. Tracking Data is collected from each Site visitor and may include your "IP Address", your operating system and browser type, the referring website, the pages of the Site you visited, the order in which you visited these pages and which hyperlinks you "clicked."

Coaching Across Borders uses Tracking Data to analyze visitors' collective behavior and characteristics, as well as interests and demographics related to particular areas of the Site.

2.4 By aggregating Information.

Aggregated Personal Information does not Personally identify you or any visitor of the Site. For instance, Coaching Across Borders may aggregate Information to measure the gender distribution of participants in the Services.

3. HOW COACHING ACROSS BORDERS USES THE INFORMATION COLLECTED.

Coaching Across Borders uses the Information collected in support of the Services in the main following ways:

3.1 Informational communications.

Coaching Across Borders may from time to time send information regarding the Services. Coaching Across Borders may also use Personal Information including e-mail address or postal address to conduct surveys. Occasionally, and with your consent, Coaching Across Borders may use your Personal Information in press releases and/or direct marketing materials.

3.2 Business purposes.

Coaching Across Borders may use Personal Information for the purpose of its business, such as internal communication regarding participants and clients, determining the effectiveness of its promotional activities, administering its services, and maintaining and securing its infrastructure.

3.3 Fulfilling your requests.

Coaching Across Borders may use Personal Information in order to reply to your inquiries and fulfill your requests. When you contact Coaching Across Borders, Coaching Across Borders may keep a record of your contact Information and your messages. Coaching Across Borders may use any Information you provide in your correspondence to respond to your inquiries and fulfill your requests.

3.4 Administrative Information.

Coaching Across Borders may periodically use Personal Information to send you Information regarding the Site. Coaching Across Borders may also contact you periodically to check that the Personal Information collected about you is accurate and up to date.

Commenté [A3]: La prospection commerciale doit faire l'objet d'un « opt-in », i.e. consentement exprès du type case à cocher. Est-ce qu'on peut ajouter une phrase du genre : et dans ce cas, vous aurez toujours l'option de décliner l'offre ?

RE: Sommes-nous toujours bien en B2B ? L'objet de la sollicitation est-il toujours bien en rapport avec la profession de l'intéressé ? L'envoi de ces informations se fait-elle bien sur l'adresse email professionnelle de l'intéressé ? Si oui, nous pouvons être en *opt-out* et un lien de désinscription en bas de l'email envoyé à des fins de prospection commerciale suffit.

La personne doit par ailleurs être informée lors de la collecte de son adresse email sur votre site internet que ses données seront utilisées à des fins de prospection commerciale.

4. DISCLOSURE TO THIRD PARTIES.

4.1 Disclosure to our network of independent coaches and business partners.

In the course of the Services, Coaching Across Borders may disclose your Personal Information to the extent necessary to its network of independent coaches and business partners for the provision of the Service. Coaching Across Borders may jointly use Personal Information with its network of independent coaches and business partners. Coaching Across Borders is responsible for managing such jointly used Personal Information.

4.2 Disclosure to service providers.

Coaching Across Borders works with third parties who provide services that may include, but are not limited to, website hosting, IT consulting, back-up and security services; data analysis; public relations services; attorneys, accountants, payroll services and other administrative services. As part of providing such services and to the extent necessary, these third parties will be granted access to Personal Information.

4.3 Business transfers.

Coaching Across Borders reserves the right to transfer or disclose Personal Information collected from visitors, or in connection with the Services, to a third party in the context of a strategic alliance with such third party, in the event of a merger involving our business, or in connection with a sale or transfer of assets of any part of our business.

4.4 Other disclosures.

Coaching Across Borders may also - to the extent that is reasonably necessary - use or disclose Personal Information in order to comply with applicable laws and respond to inquiries or requests from legal, public or government authorities, including those outside of your country of residence. Coaching Across Borders cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the manner in which they use Personal Information received either from Coaching Across Borders or from other independent sources.

5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.

Your Personal Information may be collected, used, processed, disclosed and transferred to and within France and other countries where Coaching Across Borders has facilities or in which Coaching Across Borders engages service providers. Such international transfers shall only be carried out in accordance with applicable data protection legislation. By using our Services or Site, you consent to the transfer of Information to countries outside of your country of residence, which may have different data protection rules than in your country.

6. SECURITY.

Coaching Across Borders has reasonable measures in place to protect against the alteration, loss or misuse of Personal Information about visitors of the Site. However, no security system or system of transferring Personal Information over the Internet can be guaranteed to be fully secure. If you believe that your interaction with us is no longer secure, please notify us at info@coaching-ab.com.

7. RETENTION PERIODS.

Coaching Across Borders will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Policy and in accordance with applicable data protection legislation unless a shorter or longer retention period is required or allowed by law.

8. ACCESS, RECTIFICATION AND REMOVAL OF PERSONAL INFORMATION.

You provide us with Personal Information voluntarily. However, if you do not provide certain Personal Information, you may not be able to participate in our Services.

If you wish to receive certain Information as to whether or not Coaching Across Borders holds Personal Information relating to you and to obtain a copy of such Information, you may contact us at info@coaching-ab.com.

Commenté [A4]: En application du principe de proportionnalité, il conviendrait de préciser que ce partage de données se fera « to the extent strictly necessary for the delivery of services » ou « on a need to know basis ». La 2^e partie me semble mieux, car il se pourrait qu'on aille au-delà de delivery of services, par exemple quand on développe à plusieurs l'activité chez un client. Mais doit-on l'ajouter en démarrage ? Presque chaque paragraphe inclut la formule « for the provision of service (par 1) ou « to the extent necessary » (par 2)

RE: OK

Commenté [A5]: Le partage de données avec des partenaires à des fins commerciales doit également faire l'objet d'un consentement exprès et distinct. A nouveau, je ne suis pas sûre de la façon de l'aborder ici (cf exemple donné ci-dessus)

RE : Les partenaires qui sollicitent directement les clients de CAB devront alors obtenir leur consentement exprès et distinct.

Commenté [A6]: Les transferts de données en dehors de l'UE - dans des pays ne présentant pas de niveau de protection adéquate - doivent être encadrés par des solutions de transfert, e.g. clauses contractuelles types émises par la Commission Européenne. Et donc ? Je dois ajouter qq chose à mon contrat cadre avec mes Associés ?

RE: Oui - Il conviendra alors de signer des clauses contractuelles types émises par la Commission Européenne avec les partenaires / fournisseurs situés en dehors de l'UE (ou dans les pays n'offrant pas un nouveau de protection suffisant des données à caractère personnel), lesquelles seront annexées aux contrats concernés.

Pour plus de précisions, voir les liens suivants:

<https://www.cnil.fr/fr/les-clauses-contractuelles-types-de-la-commission-europeenne>

<http://eur-lex.europa.eu/legal-content/FR/TXT/?uri=celex%3A32010D0087>

If you would like to: (i) ask questions about how Coaching Across Borders handles Personal Information; (ii) review, correct or update your Personal Information; (iii) object, on legitimate grounds, to the use of your Personal Information; or (iv) request that your Personal Information be removed from Coaching Across Borders' database, please contact us at info@coaching-ab.com. You may also unsubscribe from some of our commercial services by clicking on the link provided at the bottom of our emails.

Coaching Across Borders will comply with your request as soon as reasonably practical. Please note that Coaching Across Borders cannot be responsible for removing your Information from our database if that Information is part of a Coaching or Consulting Services assignment for your company. In such case, you may need to direct your request to your company's management. Coaching Across Borders will forward your request to the appropriate person at your company.

Coaching Across Borders also may need to retain certain Information about you, such as your e-mail address, in order to honor opt-out. Please keep in mind that this residual Information will remain within Coaching Across Borders databases, access logs and other records. The residual Information will not be used for commercial purposes.

9. LINKS TO THIRD PARTY WEBSITES.

This Policy does not address, and Coaching Across Borders is not responsible for, the privacy, Information, or other practices of any third parties. On the Site, you may follow a link from or to other websites maintained by third parties. Hypertext links to third party websites or information do not constitute or imply an endorsement, incitation or recommendation by Coaching Across Borders of the third party, the third-party web site, or the information contained therein, unless expressly stated on the Site. Because these other websites are not hosted or controlled by Coaching Across Borders, this Policy does not address their privacy practices. Coaching Across Borders encourages you to review the privacy policies of these websites.

Coaching Across Borders is not responsible for the collection, usage, data security and disclosure policies and practices of other organizations, such as **LinkedIn, Apple, Google, Microsoft or any other app provider, app developer, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you provide to other organizations through or in connection with the applications and our social media pages.**

10. POLICY UPDATES.

Coaching Across Borders reviews its privacy practices periodically. These privacy practices are subject to modifications. Coaching Across Borders encourages you to regularly review this Privacy Policy to ensure on-going familiarity with its most recent version. You may verify when this Policy was last modified by reviewing the "Date of last modification" at the bottom of the Policy pages. **Any modifications to the Policy become effective when the revised Policy is posted on the Internet, accessible through the Site.** Use of the Site after such modification constitutes your acceptance of the revised Policy then in effect.

Commenté [A7]: Il est recommandé d'attirer l'attention des utilisateurs sur les changements importants apportés à la Politique de Confidentialité. Par exemple par le biais d'un email ou d'un pop-up sur le site.