

**INFORMATION NOTICE IN RESPECT OF
PERSONAL DATA AND COOKIES
ISSUED BY THE COMPANY “HYNOVATION GROUP”**

Last updated 23rd July 2019

PREAMBLE

This information notice is intended for you as a natural person affected by the processing of personal data carried out by the company HYNOVATION GROUP when using the website for learning foreign languages under hypnosis www.hypnoledge.com (hereinafter referred to as “Hypnoledge”).

It specifies the needs of Hypnoledge to collect your data, how it will be used and protected, how long it will be retained and what your rights are.

Hypnoledge collects and processes information identifying you and which may concern your private life and your bank account (for example: name, nationality, postal address, telephone number, date of birth, profession, bank details, etc.).

This information is hereinafter **referred to as “Personal Data” or “Data”**.

Hypnoledge believes that data protection is essential to build a relationship of trust with its customers. It provides for the ongoing review of compliance with regulations on the protection of Personal Data and intends to ensure responsible governance of its computer files as well as greater transparency in dealing with the Data processing it carries out.

Who are the people whose Data is collected?

Hypnoledge collects personal information when you use the website www.hypnoledge.com (hereinafter “Website”).

Personal Data may only be collected from persons aged at least 15 (fifteen) years. If you are under 15 (fifteen) years of age, you can give your consent to the collection of your Personal Data (and consequently access to the benefits and services offered via the Website) only if you are authorised by the your legal guardian.

In using foreign language courses under hypnosis via the Website and communicating personal data, you represent and warrant to Hypnoledge that you are (i) either at least 15 years of age and (ii) are granted authorisation by your legal guardian.

This stipulation is without prejudice to the commitment you make to Hypnoledge according to which you represent and warrant to Hypnoledge that you have the judicial and legal capacity to avail of foreign language courses under hypnosis delivered via the Website and, if necessary, to pay for the said courses.

For what purposes are your Data collected and used?

Hypnoledge only collects Personal Data where it has a legal basis to do so, as set out hereunder.

For every processing operation carried out, Hypnoledge undertakes to only collect and use data that are adequate, relevant and limited to what is necessary for the purposes for which they are processed.

Hypnoledge ensures that the data are, if necessary, updated and that procedures are implemented to enable inaccurate data to be deleted or corrected.

1. Precontractual measures and/or contract performance:

Hypnoledge processes your Data for the purpose of providing you with foreign language courses under hypnosis (hereinafter the “Courses”). Processing is carried out because it is necessary for the implementation of the precontractual measures following your request for a Course and/or the performance of the contract with Hypnoledge, such as:

- Signing up to a course or taking out a subscription;
- Broadcasting the Courses you have requested online;
- Managing the Courses ordered;
- Addressing your questions and complaints;
- Transaction processing and billing, including management of Internet and payment fraud as well as payment incidents

Otherwise, Hypnoledge will not be able to conclude or perform the contract.

2. Legitimate interest on the part of Hypnoledge in carrying out processing:

The legitimate interests pursued by Hypnoledge vary and include in particular:

- Improving the customer’s level of knowledge;
- Improving the Courses and the method for foreign language learning under hypnosis;
- Communicating Courses, offers, promotions, benefits and events to you;

The data are processed having regard to your interests and your basic rights. As such, the processing is accompanied by measures and guarantees to ensure the protection of your interests and your rights in a balanced manner that has regard for the legitimate interests pursued by Hypnoledge.

These legitimate interests may be of such nature to warrant processing your data, such as:

- Surveys and measurement of customer satisfaction ;
- Provision of tailored and personalised Courses :
 - o in the context of technological developments;
 - o by improving the customer experience;
 - o or to adapt to your needs;

Cookies and other trackers

A cookie is a small file placed on your computer for a limited period of time when you browse a website.

How it is used by Hypnoledge and what are the means at your disposal to make choices with regard to such Cookies is outlined hereunder.

We use cookies to improve the usage and functionality of Hypnoledge and enrich the user experience. Your web browser stores cookies on your device's hard drive for archival purposes (for example, login details) and, in some cases, tracking. You can configure the browser to refuse cookies.

The types of cookies we use :

When you access Hypnoledge, different types of cookies are likely to be placed on your device, such as:

- "remember me" to keep your login credentials;
- "Google analytics" to measure website traffic;
- "Google ads" to measure conversion of Adwords campaigns.

Your rights

We may, where appropriate, require your consent to deposit certain types of cookies on your device. You grant us this consent when you use our services.

Your options regarding cookies

You can block cookies either systematically or on the basis of their origin, or be warned in the event of cookies being sent to your device by means of an "accept cookies" banner.

Consenting to cookies

You may or may not allow cookies to be stored on your Device. You can set your preferences and change them free of charge at any time in your browser settings.

If you have configured your browser to accept the storage of cookies on your device, the cookies present in the pages and content viewed may be stored temporarily in a dedicated location on your device. They can only be read by the sender.

Rejecting cookies

If you reject the storage of cookies on your device, or if you delete cookies already stored, you will no longer be able to use certain features of our services when the need arises.

How do I configure my browser to accept or reject cookies?

Cookie management procedures and preferences vary slightly between browsers.

You can check the cookie management procedure in the help menu of your browser.

What type of information is collected? And where does it come from? :

Hypnoledge does not process Data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, nor process genetic data, biometric data for the purpose of identifying a natural person exclusively, health data or data relating to a natural person's sex life or sexual orientation.

1. Information that you provide directly to Hypnoledge:

Hypnoledge collects directly from you the data strictly necessary for your identification, in order to contact you and allow you to have access to Courses and use the method for learning foreign languages under hypnosis.

When availing of a Course, Hypnoledge collects Personal Data about you, such as data relating to your behaviour, habits and preferences when using Hypnoledge in order to suggest the Courses best suited to your personality.

The provision of your personal information is voluntary. However, if you do not provide some or all of the information requested, Hypnoledge will not be able to provide certain Courses or information.

2. Information collected directly by Hypnoledge:

Hypnoledge automatically collects certain information about you when you access the Website, including:

- Information on your browsing behaviour (whether you are logged in or not) : Hypnoledge may use cookies and other tracking technologies to collect information about you when you interact with the Website or with the emails Hypnoledge sends to you. This information allows Hypnoledge to analyse the manner in which you interact with some content. This information is collected both when you are identified and when you are not and can be reconciled with each other, regardless of the terminal used. To find out more about cookies and how to disable them, please read the **Notice regarding cookies** stored by Hypnoledge on the Website.
- Geolocation information : When you use your mobile phone to connect and you have activated the option, Hypnoledge collects information about your geolocation.
- Recording of customer service calls made to Hypnoledge. In case of contact with one of the advisors at Hypnoledge, your conversations may be recorded for the quality assurance purposes. You are then informed of this by a call transfer message. You will always be offered other ways to contact Hypnoledge if you don't want your conversation to be recorded.

3. Information collected from third parties by Hypnoledge:

Your Personal Data may also originate from Hypnoledge's third party service providers, suppliers, partners or subcontractors if their personal data privacy policies so permit or if you have authorised them to share it. We may also be required to collect public personal data about you.

Who can access your data?

Hypnoledge takes all necessary measures to guarantee the secrecy and ensure the security and confidentiality of your Data that it has collected, that is to say to ensure that only authorised persons have access to it.

Only the persons authorised owing to their activities within the relevant departments at Hypnoledge, in charge of the corresponding processing, have access to your Data within the scope of their authorisation.

Likewise, Hypnoledge’s service providers or partners may have access to all or part of your Data in a secure manner in the course of the performance of their service or the partnership.

As such, Hypnoledge may be required to transmit your Data to its partners, service providers or suppliers. In this case, prior consent will be required. Otherwise none of your Data will be transmitted.

How long are your Data retained for?

Hypnoledge only retains your Data for processing purposes, and in compliance with its legal and regulatory obligations.

The retention period of your Data is variable and depends on the purposes of the processing:

Type of processing	Retention period
Enrolment on Courses or subscription	As long as the account is active, increased by a period of 3 years
Customer relationship management	3 years from receipt of messages
Cookies	13 months maximum
Your transaction history	As long as the account is active, increased by a period of 3 years.
Contact details and identification relating to the payment of your online orders	Until deletion through your account or until the end of validity of the credit card.
Identifying data, connection data, including IP address	1 year
Subscription to a newsletter: information relating to your email address and your options for electronic market research	Until you unsubscribe through your account or by using the unsubscribe links provided for this purpose in newsletters.

What are your rights regarding your Data?

You have the following different rights over your Data within the limits and conditions allowed under the regulations:

- Access to all your Data: you can obtain information about the processing of your Data as well as a copy of such data;
- Correct, update your Data: if you consider that your Personal Data are inaccurate or incomplete, you have the right to insist that these Data be modified accordingly;
- Delete: you can request the deletion of your Personal Data by sending your request by email to the address contact@hypnoledge.com;
- Request a reduction of the processing carried out by Hypnoledge regarding your Data;
- Request the portability of your Data: you have the right to request recovery of the Data you have provided to Hypnoledge or to have the Data transmitted to a third party of your choice if this is technically practicable;
- Withdraw your consent to the processing of your Data at any time subject to your consent;
- Object to the processing of your Data: you may for legitimate reasons related to your particular situation, object to the processing of your Personal Data, but also object, at any

time, to the processing of your Data for market research purposes, which includes processing profiling related to such market research;

- File a complaint with a supervisory authority (in France, CNIL: www.cnil.fr).

With respect to electronic communications for market research purposes: In addition, an unsubscribe link (for emails) is included on each electronic communication from Hypnoledge.

For France and where local mandatory provisions so provide, you can also set out instructions regarding the fate of your Personal Data after your death by writing to Hypnoledge by post with “Post mortem instructions” in the subject line to the address below.

How will you be notified of changes to this information notice?

Hypnoledge may amend this information notice from time to time. If necessary, it will inform you by altering the date located at the top of this document and, in certain cases, may issue additional notices (for example, by adding a statement on the home page of its Website or by sending you an e-mail).

Hypnoledge encourages you to review this information notice as soon as you interact with it to stay informed of its Personal Data protection practices, and to stay informed of the methods you can use to control the use of your Personal Data and protect your privacy.

How can you exercise your rights?

To exercise your rights, you can contact Hypnoledge’s point of contact by e-mail or post, stating your surname, first name, contact details and providing a copy of your ID.

Via e-mail :
contact@hypnoledge.com

or

By post:
HYPNOVATION GROUP
Responsable RGPD
Halle HEMERA
132 Rue Fondaudège
33000 BORDEAUX