

Privacy Policy

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Introduction

Our Privacy Policy describes why BEEGUP, in its capacity as data controller (or as a processor where BEEGUP is contractually bound to an educational institution), collects, uses, shares, and protects information as part of its digital services (hereinafter referred to collectively as “the Service”). It also describes how data are processed, what rights you have for your data, and how you can exercise them.

Our Privacy Policy applies to all persons using the Service (hereinafter referred to as “Persons using the Service”).

Your data are processed in compliance with applicable regulations, particularly French Law no. 78-17 on Information Technology, Data Files and Civil Liberties of 6 January 1978, as amended, as well as Regulation (EU) 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 (hereinafter referred to as “the Regulations”).

For your information, “personal data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as an identification number or to one or more factors specific to that natural person (name or surname, address, e-mail address, phone number, etc.).

“Processing” of personal data means any operation performed on such data (collection, storage, transmission, deletion, etc.), whether on paper or in digital form. The “Data Controller” is the person who determines the purposes of each processing and how these purposes are achieved.

BEEGUP reserves the right to edit this Privacy Policy at any time, (with prior notice to the data controller, where BEEGUP is acting as a subcontractor). All changes come into force immediately.

As a result, we advise you to regularly consult our Privacy Policy, which is accessible from all pages on the platform, to ensure you have the most up-to-

date online version. If we make changes that we consider significant, a notification will be published on the platform. We also advise you to check the date of this Privacy Policy so you are aware of the most recent update.

If users do not agree with these terms, they are free to not use the platform and to not provide any personal data.

In the context of access to the Beegup service via GAR, the privacy policy for users originating from GAR is available and detailed in the link below:

<https://app.beegup.com/docs/fr/rqpd-policy-gar.pdf>

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1. Why does BEEGUP need to collect your data?

BEEGUP is a very special platform:

- For learners, the platform is a virtual mobility solution to exchange with partners. BEEGUP is the first international network of pen pals to speak foreign languages among their peers, allowing them to be immersed in their target language, to experience other cultures and to start building their future student and/or professional network.
- For teachers, the platform is an educational resource to stimulate the autonomous oral practice of secondary students and/or college students. BEEGUP is a holistic resource that allows for creating exchanges between international classes, proposing guided activities, and tracking completed tasks.

Data collected by BEEGUP are necessary for the following purposes:

- Management of your registration with the Service and your profiles

- Saving of your personal data, so you do not have to input them repeatedly during your visit or again on future visits to the Service
- Management of exchanges with Persons using the Service
- Management of class groups and assessments
- Management of activities and interactions on the BEEGUP platform (sharing, “likes”, etc.) as well as tailored content and information
- Management of analytical data
- Management of cookies and similar technologies which are strictly necessary for the website to function
- Continuity, improvements, testing and monitoring the effectiveness of the Service
- Development and testing of new products and features
- Management of contact requests

Data are also used to initially and subsequently find a partner on BEEGUP. If you wish, you can use the “Search for partners” feature to find Search for peers to find other people with a BEEGUP account, by mother tongue, languages studied or taught and also for teachers by age of pupils. If you choose to search for partners using their names or usernames on BEEGUP, you can simply enter the names that interest you and we will search our Service.

As a general rule, BEEGUP will process none of your data for a purpose that is incompatible with that for which they were collected, unless you consent to this beforehand.

Regarding the services offered, BEEGUP is required to collect data concerning secondary school pupils(middle & high) and/or students. By definition, secondary school pupils may be aged between 11 and 19, depending on the case. Concerned about the protection of data relating to minors, BEEGUP undertakes to ensure the confidentiality of the data and to follow the recommendations laid down by the CNIL and to respect the provisions of the Regulation. In this respect, a parental authorisation form is available for downloading directly from the platform to obtain the agreement of the parental authority of high school students under the age of 15.

2. What data does BEEGUP collect?

BEEGUP collects different types of personal data from you:

Personal data that you give us directly:

- When you register: surname, first name or pseudonym, year of birth and/or age of pupils, school, town, country, mother tongue, languages studied and/or taught, avatar, user name, password and e-mail address. For students, also level of study and field of study.
- When you create your profile: surname, first name or pseudonym, school, pupils' age and/or year of birth, town, country, mother tongue, languages studied and/or taught, and avatar, optional for pupils with interests (multiple choice available). For students, also level of study and field of study.
This data enables us to help People who use the Service to find each other on BEEGUP.
- During publication on the Service: content, content consulted, activities led, audio instructions and/or texts and/or audio recordings.
- During communication between BEEGUP and the People who use the Service: This may involve, for example, e-mails from us: relating to the Service (account verification, changes and updates to the Service's features, technical and security notices, etc.), "Get to know a peer" notifications, new message and/or e-mail alerts, new message alerts, and/or "a peer has tried to contact you" alerts, notifications relating to new features in your workspace.

Giving your personal data to us is voluntary. However, some information indicated with an asterisk is essential for BEEGUP. BEEGUP cannot provide the Service without this information.

- **Personal data that we collect automatically:**

We collect some information about you automatically when you access the BEEGUP platform, particularly information pertaining to your browsing. BEEGUP uses cookies and other tracking technologies to collect information about you when you interact with the BEEGUP platform.

BEEGUP uses analysis tools to help you get to know peers you have things in common with, in reciprocity of languages studied and/or taught, and/or age of the students and/or shared interests.

3. What is the legal basis for the data processing?

BEEGUP collects your personal data for the purposes listed in Section 1 of this Privacy Policy. In all cases, BEEGUP will collect your data only if their collection and processing has a legal basis.



Execution of contractual relationships with BEEGUP

Your data are required to execute the contract that you have taken out or wish to take out. Given this contractual legal basis, a refusal to provide personal information will prevent the contract from being concluded and executed.

The performance of a task in the public interest of the educational establishment (when BEEGUP acts as a subcontractor)

Your data is necessary for the performance of a task of public interest entrusted to the school.

Legitimate interests of BEEGUP

BEEGUP may process your personal data for the purpose of pursuing its legitimate interest, particularly to improve and develop the Service.

Your prior consent

No commercial prospecting by e-mail will be sent to you without your prior consent.

4. For how long will your data be saved?

Your data will be saved by BEEGUP for the time necessary to fulfil the purposes described in Section 1 of this Privacy Policy, plus the legal compulsory storage periods.

Data collected and processed on the BEEGUP platform are saved as of the time when the Persons using the Service use the Service. The data are then saved for one year as of the end of use of the Service or of the deletion of the profile. The data may be deleted if the Persons using the Service exercise their right to erasure.

Connection data will be saved for six months.

Data that are required to improve and develop the Service will be saved anonymously.

Data processed for the purposes of commercial canvassing is kept until consent is withdrawn or 3 years after your last contact with BEEGUP (for teachers and/or school heads only).

For further information on the duration of storage of your data, you can contact the Data Protection Officer (DPO) of BEEGUP (see Section 5.2 of this Privacy Policy).

5. What rights do you have and how can you exercise them?

5.1. Your rights pertaining to your data

Right of access

You can ask BEEGUP to confirm whether your data are being processed or not; if they are, you can request access to all data and information held by BEEGUP.

Right to rectification

You can ask BEEGUP to promptly rectify or correct any data about you that is inaccurate or incorrect or misinformed. You can also ask for incomplete data to be completed, if applicable.

You can update your account at any time by signing in and changing the settings in your profile.

Right to erasure

Unless prohibited by law, you can ask BEEGUP to promptly delete your data if you believe that the processing of your data by BEEGUP is no longer necessary for the purposes for which they were collected.

Right to data portability

You have the right to receive some of your data in an open and machine-readable format or to ask BEEGUP to transmit this to another entity. This right is applicable only to data that you have actively and deliberately provided to BEEGUP (e.g., data that you filled in in an online form) or data generated when using the Service or as part of the conclusion and management of your contract, which are processed in an automatic manner based on consent or the execution of the contract.

Right to object

You can object to the use of your data by BEEGUP for a specific purpose. In this case, you must explain the reasons relating to your specific situation.

If you no longer wish to receive e-mails from us, you can change this in the settings of your account.

Right to restrict processing

You can ask BEEGUP to save your data without using them in the following situations:

- you contest the accuracy of the data used by BEEGUP
- you object to the processing of your data
- the use was unlawful but you object to the deletion of your data

- you need the data to establish, exercise or defend a legal claim.

Right to withdraw consent

You can withdraw your consent to be canvassed via the unsubscribe link (at the bottom of the e-mail)

Right to issue instructions after death

You can issue instructions on the storage, deletion, and communication of your data after your death. These instructions define the manner in which you want your rights pertaining to your data to be exercised after your death. You can send these instructions to us by in writing to the Data Protection Officer (DPO) of BEEGUP (see Section 5.2 of this Privacy Policy), specifying “Instructions after death” in the subject line. You may change or revoke these instructions at any time.

Right to lodge a complaint with the French Data Protection Authority (CNIL)

If you deem that your rights were not respected or that your data have not been protected in compliance with the General Data Protection Regulation (GDPR), you may lodge a complaint at any time with the competent supervisory authority (in France, this is the CNIL, i.e., the French Data Protection Authority), either directly on the CNIL website or by post to: CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, FRANCE.

5.2. Exercising your rights

To exercise any of your rights, please send your request by e-mail to dpo@beegup.com or by post to LOUISE MICHEL, 2 rue Diaz, 92100 Boulogne-Billancourt, France

All requests must state the purpose of the request in the subject line (exercising the right of access, right to object, etc.). The request must also contain proof of your identity and a return address for the response.

BEEGUP will respond to you within a maximum of one (1) month as of the date of receipt of your request. However, this time frame may be extended to two (2) months, depending on the complexity and number of requests received.

If, after contacting BEEGUP, you deem that your rights as set out in the French Law on Information Technology, Data Files and Civil Liberties have not been



respected, you can lodge a complaint with the French Data Protection Authority (CNIL).

6. With whom does BEEGUP share your data?

BEEGUP undertakes to not lend, sell, or share your personal data with any third parties without your consent.

Third parties with which you can choose to share your content and user profile:

Any information or content (user content or similar) that you voluntarily share for posting on the Service will become available to the BEEGUP community.

User content and personal information entered at registration, with the exception of the e-mail address, will automatically be public and may be searched by others and used by BEEGUP.

Personal data on your profile are accessible by Persons using the Service, who may be located in France, the European Union, or outside the European Union. However, data will not be transferred to companies or institutions located outside of the European Union.

7. Will your data be transferred outside of the EU?

Your data are hosted on secure servers located in France. If your data were to be transferred outside of the EU, particularly by any of our partners, we would pay particular attention to ensure that these entities process your data in full compliance with applicable personal data protection regulations. If these partners were to be located in a country for which the European Commission has not issued an adequacy decision acknowledging a level of data protection comparable to that in the European Union, a standard contract will be concluded based on that approved by the European Commission.

8. How does BEEGUP ensure data transfers are secure?

BEEGUP shall take all technical, physical and organisational measures to ensure your data remain secure and confidential when they are collected, processed and transferred.

BEEGUP infrastructure is protected against malware. Physical and remote access to the servers hosting your data is controlled. Intrusion tests are performed, back-ups are saved regularly, and restoring tests are also performed. The security of the device from which you connect to our platform is your responsibility.

You are responsible for ensuring that your password and account information remain confidential and that access to e-mails between you and BEEGUP is controlled.

Should BEEGUP work with partners to process some of your data, it will undertake to verify that they can ensure adequate guarantees for the protection of the personal data given to them, and will have them sign non-disclosure agreements in compliance with Article 28 GDPR.

Should personal data be violated, i.e., should a security incident occur, malicious or otherwise and deliberate or otherwise, the consequence of which is a compromising of the integrity, confidentiality, or availability of your personal data, BEEGUP shall undertake to comply with the following obligations:

FOR YOU, THE VIOLATION OF YOUR DATA HAS OBLIGATIONS	NO RISK	SOME RISK	HIGH RISK
Internal documentation , in the “violation log”	X	X	X
Report to the CNIL within 72 hrs max.	-	X	X
You will be informed without undue delay	-	-	X

The “violations log” contains the following information:

- The nature of the violation;
- The categories and approximate number of persons affected;
- The categories and approximate number of files affected;
- The probable consequences of the violation;
- The measures taken to address the violation and, if applicable, to limit any negative consequences;

- If applicable, the justification for not notifying the CNIL or the persons affected.

However, and in compliance with applicable regulations, BEEGUP does not have to inform you of a violation in the following cases:

- Your personal data are protected by measures making them unreadable for unauthorised persons;
- Measures were taken to ensure that the risk is no longer likely to occur;
- Providing this information would require unreasonable effort from BEEGUP, particularly if BEEGUP has no contact information to be able to inform you.

9. Required fields

Fields in our form marked with an asterisk are required. If no response is given, BEEGUP will be unable to provide the Service. Providing the requested data is a contractual obligation as it is necessary either for the execution of the contract you concluded or for precontractual measures at your request.

10. Privacy by Design/by Default

BEEGUP undertakes to integrate the protection of personal data into the design of a project, service, or any other feature related to the use of personal data, particularly via the principles of data minimisation, purpose limitation, compliance with data integrity and confidentiality, and storage limitation.

11. Accountability

To respect the principle of accountability, BEEGUP will:

- adopt internal processes to ensure the Regulations are complied with (IT charter, data protection charter);
- save a paper trail for all processing carried out under its responsibility (maintaining a processing log, non-disclosure agreements with employees and contractors, company security policy, procedures to manage requests for right of access, right to rectification, right to object, etc.);
- perform privacy impact assessments (PIA) for processing with specific risks in terms of rights and liberties.



The purpose of this is to provide complete documentation that can demonstrate at any time that data protection rules have been complied with.

In legal terms, the French version of this privacy policy constitutes the sole authentic version.