

# CHARTER ON THE PROTECTION OF CLIENT' PERSONAL DATA

When using the website <https://dashboard.pipplet.com/> (hereinafter the "**Platform**") and [www.pipplet.com](http://www.pipplet.com), allowing companies, recruitment firms or training bodies (hereinafter the "**Client**") to purchase our products and register your Test takers, collaborators, or employees (hereinafter the "**Test takers**") in order to assess their linguistic skills, you will be communicating your personal data, designating any data allowing to identify you as an individual directly or indirectly.

## Purpose of this charter

We, Pipplet SAS ("Pipplet", "we", "us"), a simplified joint-stock company, registered at the Paris Trade and Companies Register under number 813 493 673, the registered office of which is located at 24 rue Chauchat – 75009 Paris, are committed to respecting your privacy. Please read this privacy charter carefully to understand our practices regarding your personal data and how we will process it. Pipplet has a clear objective to be transparent in its use of personal data and to ensure that Clients and Test takers, where we store or process personal data, have their privacy maintained to provide the security and trust expected of our organisation. We inform you that we implement to collect and process your personal data, in strict compliance with your rights. We indicate to you that we comply with law no. 78-17 of 6 January 1978 regarding Information Technology, Files and Liberties, in its applicable version, as well as with the General Data Protection Regulation no. 2016/679 of 27 April 2016 in the collection and management of your personal data.

## Definitions

**“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**“Client”** is a reference to past or current Pipplet clients. The Client is a data controller and in a business relationship with Pipplet.

**“Examiner”** means a third-party provider reviewing and scoring Pipplet’s test session.

**“Personal Data”** is defined as any information (including opinions and intentions) relating to an identified or identifiable natural person. It can reference, but is not limited to, the following identifiers: a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Platform”** means the platform where Client’s online account is hosted.

**“Processing”** of personal data may include “collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction and any may be by automated or manual means.”

**“Processor”** means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

**“Test taker”** is a reference to any individual who has been registered to take a Pipplet test.

**“Third-party service provider”** is an organisation that is acting as a data processor for a company, such as a recruitment agency, and which is in a business relationship with us as a Client.

## *Identity of the data collector and controller*

The controller of your Personal Data is the company Pipplet, a simplified joint-stock company, registered at the Paris Trade and Companies Register under number 813 493 673, the registered office of which is

located at 24 rue Chauchat – 75009 Paris (hereinafter referred to as “We”).

## **Nature of personal data that Pipplet collects**

We inform you, when collecting your Personal Data, if certain data shall necessarily be provided or if it is optional. We also indicate to you any consequences of a failure to respond.

We will collect the following data in this regard:

### **Information that you communicate to us**

For the proper execution of services that we offer via the Platform, we collect the following data:

- **Information allowing your identification when opening your account:** surname, given name, email address, phone number, affiliated company.
- **Any information that you choose to communicate.**

### **Information that we collect automatically**

We may also automatically collect your Personal Data via tools and services proposed on the Platform, and notably the following data:

- **Information regarding the use of tools and features of the Platform:** we collect information regarding your interactions with the Platform and notably pages and content viewed on the Platform, links on which you have clicked, the language parameters of your browser.
- **Information regarding connection and regarding equipment and devices that you use to connect to the Platform:** we collect connection data from devices when you access and use the Platform and notably your browser, connection dates and times, data regarding the computer hardware and software used, unique identifiers, crash data, pages viewed or displayed before or after the connection to the Platform.

To learn more about the cookies that we collect during your visit on one of our platforms, please check out the Cookie Policy via this [link](#)

## **Purposes of our processing activities**

Your Personal Data is collected and processed for one or more of the following purposes:

Information that you communicate to us

- Managing your access to the Platform and to services accessible on the Platform and their use, as well as responding to any request regarding your use of the services,
- Carrying out the operations regarding the management and the monitoring of our relationships with the users of our services,
- Sending newsletters, solicitations and promotional messages as well as any information messages regarding our news and/or any change in our Services. If you do not wish to receive them, we give you the option to express your refusal in this regard when collecting your data;
- Managing outstanding amounts and any disputes regarding the use of our products and services,
- Optimising the operation and efficiency of products and services that we offer,
- Complying with our statutory and regulatory obligations, if applicable.

### **Information that you communicate to us**

- Sending advertisements, and notably targeted advertisements. If you do not wish to receive them, we give you the option to express your refusal in this regard when collecting your data,
- Managing people's opinions on products, services or content,
- Optimising the operation and efficiency of products and services that we offer,

- Preparing commercial statistics of use and traffic of our services.

### **Personal Data to ensure the validity of your test.**

**In order to ensure the validity of your test results, Pipplet has a legitimate interest to prevent Fraud or fraudulent behavior. In this respect and on behalf of the Client who invited you to take the test, Pipplet processes the following data:**

- Picture of your face
- Valid ID card

**Pipplet will store this Personal Data for 6 months. Thereafter, these Personal Data will be removed from our systems, unless a fraudulent behavior is detected. In this case, your Personal Data will be stored for 24 months. In case you request to delete your Personal Data sooner, this will be granted if the data is no longer necessary for the purpose of ensuring test validity.**

## **Legal ground for the processing of your data**

In terms of the services that we provide to you via the Platform, we collect and process your Personal Data for the purposes listed above, for which the legal basis can be found in the GDPR. The legal basis may vary per purpose. Please find below an overview of the legal basis that we are using to allow the processing activities of your Personal Data:

### **Consent (article 6.1 (a) GDPR)**

As your prior consent is required for any processing of your personal data, it will be requested in the form of a box to be ticked directly on the data collection form. You will have the possibility to express your refusal in this regard at the time of the collection of your data notably within the framework of the following activities:

- Sending newsletters, solicitations and promotional messages as well as any information messages regarding our news and/or any change in our Services,
- Sending advertisements, and notably targeted advertisements.

### **Performance of a contract (article 6.1 (b) GDPR)**

In terms of the services that we provide to you via the Platform, we collect and process your Personal Data that is necessary for the execution of the contract binding us for the following purposes:

- Managing your access to the Platform and to services accessible on the Platform and their use, as well as responding to any request regarding your use of the services,
- Creating a certificate for registered Test Taker,
- Carrying out the operations regarding the management and the monitoring of our relationships with the users of our services.

### **Necessary for compliance with a legal obligation (article 6.1 (d) GDPR)**

- Complying with our statutory and regulatory obligations, if applicable.

### **Legitimate interest (article 6.1 (f) GDPR)**

**We collect your Personal Data for the purposes of our legitimate interest and notably for the following purposes:**

- Preparing commercial statistics of use and traffic of our services,
- Optimising the operation and efficiency of products and services that we offer,
- Managing people's opinions on products, services or content,
- Managing outstanding amounts and any disputes regarding the use of our products and services.

## **Recipients of collected and processed data**

Only the staff of our company, the services in charge of the control (notably auditors) and our subcontractors shall have access to your Personal Data. We will communicate your Personal Data to the Test takers that you register on the test for the strict necessity of the execution of services. Each Client remains however solely liable for compliance with its statutory obligations in terms of its processing of Test taker's Personal Data, with its own means and for its own purposes. We are only liable for our use of Test taker's Personal Data, excluding any other use by a Client using our services. Your Personal Data and Test taker's Personal Data may also be sent to public bodies, exclusively for the purposes of complying with our statutory obligations, court officers and public officers.

## **Transfer of personal data**

Your Personal Data shall not be subject to transfers, leases or exchanges to the benefit of third parties, for the execution of one of the purposes detailed above and with the aforementioned reservations. You are however informed that we reserve the option to communicate your fully anonymised data to third parties in an aggregate form, that is in a form that does not allow for your identification in any manner whatsoever. This anonymised data is used for marketing and business purposes.

## **International Transfer of personal data**

Your Personal Data is kept and stored for the entire duration of its storage on servers of the company Heroku located within the European Union. Your Personal Data shall not be subject to any transfer outside the EEA or Switzerland in terms of the use of services that we provide to you. However, if it were to be transferred, we inform you that the

transfer shall necessarily occur in terms of the execution of the purposes detailed in this charter and to a country representing an adequate level of protection or after having concluded an agreement governing the transfer in accordance with the model agreement of the European Commission. We may also make transfers to recipients with approved Binding Corporate Rules. Pipplet does not rely on the EU-U.S. Privacy Shield Framework as a legal basis for transfers of Personal Data.

## **Data retention period of personal data**

*1. Regarding the management of data subject requests and objection lists to be received from prospect:* Information allowing to take into account your right to object to marketing emails is stored at least twenty-four (24) months as from the date you exercise your right. Information allowing to take into account the exercise of your rights, granted by the GDPR, is stored at least twenty-four (24) months as from the collection date.

*2. Regarding statistics of audience measurements:* Information stored on the users' terminal or any other element used to identify the users and allowing their traceability or visit shall not be stored for more than thirteen (13) months.

*3. For data regarding the monitoring and management of relationships with Clients:* Your Personal Data is stored for a maximum period of twenty-four (24) months as from the collection date. We can delete your data upon simple request at any time. However, data allowing to prove a right or a contract, to be stored in terms of compliance with a statutory obligation, shall be stored for the duration provided for by the applicable law, that is for a maximum duration of five (5) years as from the collection thereof, on an intermediary storage device.



## **Security**

We inform you that every necessary caution as well as all appropriate organisational and technical measures are taken to preserve the security, integrity and confidentiality of your Personal Data and notably to prevent any misuse of, damage or unauthorised third-party access to it.

## **Data processed on our Website and Platform**

To learn more about the cookies that we collect during your visit on one of our platforms, please check out the Cookie Policy via this [link](#)

## **Exercising your rights**

Pipplet respects the rights of EEA residents to access, correct and request erasure or restriction of their Personal Data as required by law. This means:

- You generally have a right to know whether or not Pipplet maintains your Personal Data. If we do have your Personal Data, we will provide you with a copy (subject to the rights of others).
- If your information is incorrect or incomplete, you have the right to ask us to update it.
- You have the right to object to our processing of your Personal Data.
- You may also ask us to delete or restrict your Personal Data.

It is reminded that any person can request the restriction of processing of data concerning him/her or object to the said processing, on legitimate grounds.

You have the right to access your data to have it communicated to you and if applicable to rectify or delete it by sending us an email at:

- Email address: [dpo@pipplet.com](mailto:dpo@pipplet.com)
- Postal address: 24 rue Chauchat – 75009 Paris

Please understand that we may need to verify your identity before we can process your request. We also inform you that we will notify the request to the persons to whom we communicated your data, unless this communication turns out to be impossible.

We inform you that in case of rectification or deletion of your Personal Data, as well as in case of restriction of processing carried out following your request, we will notify the said changes to the persons to whom we communicated your data, unless this communication turns out to be impossible. You also have a right to the portability of the Personal Data that you provided to us, understood as data that you actively and deliberately declared in terms of the access to and use of the Platform, as well as data generated by your activity in terms of the use of the Platform. We remind you that this right does not concern the data collected and processed on a legal basis other than the consent or the execution of the contract binding us, and notably the data collected in our legitimate interest or on a statutory basis.

This right may be exercised free of charge at any time, and notably when you close your account on the Platform, in order to recover and store your Personal Data. In this regard, we send you your Personal Data in a standard open commonly used and machine-readable format in any way deemed necessary, according to the state of the art. You are also informed that you have the right to submit a complaint to the National Commission for Information Technology and Liberties (*Commission Nationale Informatique et Libertés*) if you consider that the processing of your Personal Data, that is the subject matter of this charter, constitutes a breach of applicable provisions. This remedy may be exercised without prejudice to any other remedy before an administrative or judicial court. You in fact also have a right of effective administrative or judicial remedy if you consider that the processing of your Personal Data constitutes a breach of applicable provisions.

## **Communication regarding a breach of personal data**

We will inform you as soon as possible if we observe a security breach in the processing of your Personal Data that can present a significant risk for your rights and liberties. On this occasion, we will provide you with the detail of the nature of the breach encountered and the measures implemented to put an end to it.

## **Amendments**

We reserve the right to amend this charter at any time, in full or in part, at our sole discretion. These amendments shall enter into force as from the publication of the new charter that will be notified to you in any way deemed necessary. Your use of the Platform following the entry into force of these amendments shall constitute acknowledgment and acceptance of the new charter. Failing which and if you are not satisfied with the new charter, you should no longer access the Platform.

## **Entry into force**

This charter enters into force on June 12<sup>th</sup>, 2024.

# CHARTER ON THE PROTECTION OF TEST TAKER' PERSONAL DATA

When using the Pippet's platform test Audition.pippet.com (hereinafter the "**Platform**"), allowing companies, recruitment firms or training bodies (hereinafter "**Clients**" and "**Third-party service provider**") to assess the linguistic skills of their recruitment candidate, their collaborators or employees (hereinafter the "**Candidates**"), you will be communicating your Personal Data.

## Purpose of this charter

Pippet SAS ("**Pippet**", "**We**", "**Us**"), a simplified joint-stock company, registered at the Paris Trade and Companies Register under number 813 493 673, the registered office of which is located at 24 rue Chauchat – 75009 Paris, is committed to respecting your privacy. Please read this privacy charter carefully to understand our practices regarding your Personal Data and how We will process it. Pippet has a clear objective to be transparent in its use of Personal Data and to ensure that Candidates, where We store or process Personal Data, have their privacy maintained to provide the security and trust expected of our organisation. We inform you on the means that we implement to collect and process your Personal Data, in strict compliance with your rights. We indicate to you that we comply with law no. 78-17 of 6 January 1978 regarding Information Technology, Files and Liberties, in its applicable version, as well as with the General Data Protection Regulation no. 2016/679 of 27 April 2016 (the "GDPR") in the collection and management of your Personal Data.

## Definitions

**“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**“Client”** is a reference to past or current Pipplet clients. The Client is a data controller and in a business relationship with Pipplet.

**“Examiner”** means a third-party provider reviewing and scoring Pipplet’s test session.

**“Personal Data”** is defined as any information (including opinions and intentions) relating to an identified or identifiable natural person. It can reference, but is not limited to, the following identifiers: a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Platform”** means the platform where Pipplet’s tests are being administered and which is available to test takers following their registration by the Client.

**“Processing”** of personal data may include “collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction and any may be by automated or manual means”.

**“Processor”** means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

**“Test taker”** is a reference to any individual who has been registered to take a Pipplet test.

**“Third-party service provider”** is an organisation that is acting as a data processor for a company, such as a recruitment agency, and which is in a business relationship with us as a Client.

## *Identity of the data collector and controller*

The Controller of your Personal data is the Client which has registered you to a Pipplet's test session. It means that Pipplet is acting as a Processor or a sub-processor on behalf of the Client or Third-party service provider and We invite you to refer to the information for data subjects or privacy policy provided to you by such Client or Third-party service provider for details on how your Personal Data are being processed by them. In case of any conflict between the information provided by the Client or the Third-party service provider and the below provisions, the information provided by the Client or Third-party service provider supersedes the below provisions. We always establish a Data Processing Agreement (DPA) with our Clients. The agreement regulates which data We can process, and how We can do it. Our promise to our Clients and Test taker is that we will never process data in any other way or for any other purpose than what is agreed in the DPA, unless we have a legal obligation, or We have obtained your prior explicit consent to do it.

## **Nature of personal data that Pipplet collects**

We will collect the following data in this regard:

Information that you communicate to us or our Client communicate to us on your behalf

For the proper execution of services that We offer via the Platform, We collect the following data:

- **Information allowing for your identification** when opening your account: surname, given name, email address, phone number, affiliated company.
- **Information regarding linguistic skills:** voice recording, test answers, test results;
- **Any other information that you choose to communicate by contacting us by email, telephone or via our chatbot on**

[www.pipplet.com](http://www.pipplet.com) and [audition.pipplet.com](http://audition.pipplet.com).

### **Information that We collect from Examiner**

- Our Examiners only access anonymized data. They cannot identify you with the information that we are providing them with in order to evaluate your test session. However, Pipplet can collect any comments or remarks from the Examiner on the Test taker's performance during the linguistic test session.

### **Information that we collect from our artificial intelligence solutions**

- By taking a language test on the Pipplet website, you agree to have your test answers evaluated by AI tools. These tools are designed to assess your level of language proficiency and provide you with a level based on the Common European Framework of Reference for Languages (CEFR). AI tools are not human and may not always reflect the same judgment as a human evaluator. You agree that Pipplet may use your test data for research and improvement purposes. We respect your privacy and will not share your test data with third parties without your consent, unless required to do so by law or court order. We also take appropriate measures to ensure the security of your test data and to prevent unauthorized access, disclosure, alteration or destruction. We inform you that you have the right to access, rectify, object to and delete your personal data with the website provider, as well as the right to lodge a complaint with the French Data Protection Authority (CNIL).

### **Information that We collect automatically**

**We may also automatically collect your Personal Data via tools and services proposed on the Platform, and notably the following data:**

## **Information regarding connection and regarding equipment and devices that you use to connect to the Platform:**

we collect connection data from devices when you access and use the Platform and notably your browser, IP address, connection dates and times, data regarding the computer hardware and software used, unique identifiers, crash data, pages viewed or displayed before or after the connection to the Platform.

To learn more about the cookies that we collect during your visit on one of our platforms, please check out the Cookie Policy via this [link](#)

## **Purposes of our processing activities**

We inform you, when collecting your Personal Data, if certain data shall necessarily be provided or if it is optional. We also indicate to you any consequences of a failure to respond. Your Personal Data is collected and processed for one or more of the following purposes:

Information that you communicate to us or our Client communicate to us on your behalf

- Managing your access/registration to the Platform and to services accessible on the Platform and their use, as well as responding to any request regarding your use of the services,
- Identify you as a Test taker,
- Assessing your oral and written linguistic skills,
- Creating a certificate for registered Test taker,
- Managing any disputes regarding the use of our products and services,
- Managing people's opinions on products, services or content,
- Complying with our statutory and regulatory obligations, if applicable.
- Managing people's opinions on products, services or content via a survey at the end of test session.



## **Information that We collect from Examiner**

- Assessing your oral and written linguistic skills.

## **Information that We collect from our artificial intelligence solutions**

- Assessing your oral and written linguistic skills.

## **Information that We collect automatically**

- Carrying out the operations regarding the management and the monitoring of our relationships with the users of our services,
- Optimising the operation and efficiency of products and services that we offer.

## **Legal ground for the processing of your data**

In terms of the services that We provide to you via the Platform, We collect and process your Personal data for the purposes listed above, for which the legal basis can be found in the GDPR. The legal basis may vary per purpose. Please find below an overview of the legal basis that we are using to allow the processing activities of your Personal data:

### **Consent (article 6.1 (a) GDPR)**

**Whenever your prior consent is necessary to process your Personal data, We will ask you to consent with a box to tick directly on the form for the collection of your data. You will have the possibility to express your refusal in this regard on the occasion of the collection of your Personal data.**

### **Performance of a contract (article 6.1 (b) GDPR)**

**In terms of the services that we provide to you via the Platform,**

**we collect and process your Personal Data that is necessary for the execution of the contract binding us for the following purposes:**

- Managing your access to the Platform and to services accessible on the Platform and their use, as well as responding to any request regarding your use of the services,
- Carrying out the operations regarding the management and the monitoring of our relationships with the users of our services,
- Assessing your oral and written linguistic skills.
- Creating a certificate for registered Test taker.

**Necessary for compliance with a legal obligation (article 6.1 (d) GDPR)**

Complying with our statutory and regulatory obligations, if applicable.

**Legitimate interest (article 6.1 (f) GDPR)**

**We collect your Personal Data for the purposes of our legitimate interest and notably for the following purposes:**

- Optimising the operation and efficiency of products and services that we offer,
- Managing people's opinions on products, services or content via a survey at the end of test session.
- Managing any disputes regarding the use of our products and services.

**Recipients of collected and processed data**

Only the staff of our company (notably our examiners), the services in charge of the control (notably auditors) and our subcontractors shall have access to your Personal Data. We will communicate your Personal Data to the company that registered you for the assessment of your linguistic skills for the strict necessity of the execution of services. This

company may use the data provided for the same purposes and under the same conditions as those referred to in this charter. Each company remains however solely liable for compliance with its statutory obligations in terms of its processing of your Personal Data, with its own means and for its own purposes. We are only liable for our use of your Personal Data, excluding any other use by a company using our services. Your Personal Data may also be sent to public bodies, exclusively for the purposes of complying with our statutory obligations, court officers and public officers.

## **Transfer of personal data to third parties**

Your Personal Data shall not be subject to transfers, leases or exchanges to the benefit of third parties, for the execution of one of the purposes detailed above and with the aforementioned reservations. You are however informed that we reserve the option to communicate your fully anonymised data to third parties in an aggregate form, that is in a form that does not allow for your identification in any manner whatsoever. This fully anonymised data will be used for evaluation purposes.

## **International Transfer of personal data**

Your Personal Data is kept and stored for the entire duration of its storage on servers of the company Heroku located within the European Union. Your Personal Data shall not be subject to any transfer outside the EEA or Switzerland in terms of the use of services that we provide to you. However, if it were to be transferred, we inform you that the transfer shall necessarily occur in terms of the execution of the purposes detailed in this charter and to a country representing an adequate level of protection or after having concluded an agreement governing the transfer in accordance with the model agreement of the European Commission. We may also make transfers to recipients with

approved Binding Corporate Rules. Pipplet does not rely on the EU-U.S. Privacy Shield Framework as a legal basis for transfers of personal data.

## **Data retention period of personal data**

- 1. For data regarding the monitoring and management of relationships with users and data regarding your linguistic skills: Your Personal Data is stored for a maximum period of twenty-four (24) months as from the collection date. We can delete your data upon simple request at any time. However, data allowing to prove a right or a contract, to be stored in terms of compliance with a statutory obligation, shall be stored for the duration provided for by the applicable law, that is for a maximum duration of five (5) years as from the collection thereof, on an intermediary storage device.*
- 2. Regarding the management of data subject requests: Information allowing to take into account the exercise of your rights, granted by the GDPR, is stored at least twenty-four (24) months as from the collection date.*
- 3; Regarding statistics of audience measurements (if applicable): Information stored on the users' terminal or any other element used to identify the users and allowing their traceability or visit shall not be stored for more than thirteen (13) months.*

## **Security**

We inform you that every necessary caution as well as all appropriate organisational and technical measures to preserve the security, integrity and confidentiality of your Personal Data and notably to prevent any misuse of, damage or unauthorised third-party access to it.

## **Data processed on our Website and Platform**

To learn more about the cookies that we collect during your visit on one of our platforms, please check out the Cookie Policy via this [link](#)

## **Exercising your rights**

Pipplet respects the rights of EEA residents to access, correct and request erasure or restriction of their Personal Data as required by law. This means:

- You generally have a right to know whether or not Pipplet maintains your Personal Data. If we do have your Personal Data, we will provide you with a copy (subject to the rights of others).
- If your information is incorrect or incomplete, you have the right to ask us to update it.
- You have the right to object to our processing of your Personal Data.
- You may also ask us to delete or restrict your Personal Data.

It is reminded that any person can request the restriction of processing of data concerning him/her or object to the said processing, on legitimate grounds. You also have a right to the portability of the Personal Data that you provided to us, understood as data that you actively and deliberately declared in terms of the access to and use of the Platform, as well as data generated by your activity in terms of the use of the Platform. We remind you that this right does not concern the data collected and processed on a legal basis other than the consent or the execution of the contract binding us, and notably the data collected in our legitimate interest or on a statutory basis. This right may be exercised free of charge at any time, and notably when you close your account on the Platform, in order to recover and store your Personal Data. In this regard, we send you your Personal Data in a standard open commonly used and machine-readable format in any way deemed necessary, according to the state of the art.

To exercise these rights, please contact us at:

- Email address: [dpo@pipplet.com](mailto:dpo@pipplet.com)
- Postal address: 24 rue Chauchat – 75009 Paris

Please understand that we may need to verify your identity before we can process your request. We also inform you that we will notify the request to the persons to whom we communicated your data, unless this communication turns out to be impossible.

Additionally, our ability to delete Personal Data will be limited in those cases where we are required to retain records, such as in connection with score reports and test security processes.

If you believe that we have processed your Personal Data in violation of applicable law, you may file a complaint with a Supervisory Authority or contact Pipplet.

This remedy may be exercised without prejudice to any other remedy before an administrative or judicial court. You in fact also have a right of effective administrative or judicial remedy if you consider that the processing of your Personal Data constitutes a breach of applicable provisions.

## **Communication regarding a breach of personal data**

We will inform you as soon as possible if we observe a security breach in the processing of your Personal Data that can present a significant risk for your rights and liberties. On this occasion, we will provide you with the detail of the nature of the breach encountered and the measures implemented to put an end to it.

## **Amendments**

We reserve the right to amend this charter at any time, in full or in part, at our sole discretion. These amendments shall enter into force as from the publication of the new charter that will be notified to you in any way deemed necessary. Your use of the Platform following the entry into force of these amendments shall constitute acknowledgment and acceptance of the new charter. Failing which and if you are not satisfied with the new charter, you should no longer access the Platform.

## **Entry into force**

This charter enters into force on June 12<sup>th</sup>, 2024.