



PRIVACY POLICY

1 - General Information

1to1 Consulting SAS, concerned with the rights of individuals, particularly in regards to automated data processing, and in a desire for transparency with its clients, has put in place a policy covering all such processing, the purposes pursued by the latter as well as the means of action available to individuals so that they may best exercise their rights. We therefore invite you to read this document carefully to identify and understand the practices we implement regarding the processing of your personal data.

For any further information on the protection of personal data, we invite you to refer to the following site: <https://www.cnil.fr/>

The current online version of these terms of use is the only enforceable version for the duration of use of the site and , until a new version replaces it.

2 - Legal Information

2.1 –Company

1to1 Consulting SAS, SAS with a capital of 209 893€, whose registered office is located at Horizon 2000, Mach 6, Avenue des Hauts Grigneux -76420 BIHOREL, FRANCE is represented by Alexis Jonathan Ways, in his capacity as Chairman, and registered with the RCS of Rouen under SIREN number: 529417248.

2.2 - Host

1to1 Consulting SAS is hosted by OVH, whose head office is located at 2, rue Kellermann, 59100 Roubaix, FRANCE.

2.3 - Data Protection Officer (DPO):

A data protection officer can be contacted at rgpd@7speaking.com. He is available to answer any question relating to the protection of your personal data.

3 - Data collection

Your data is collected by 1to1 Consulting SAS.

Personal data refers to any information concerning an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number or to one or more elements specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity.

The personal information that may be collected is primarily used by the publisher to manage relations with you and, where appropriate, to process your orders.

3.1 - Information that you communicate directly to us

By using our platform or our services, you may communicate information to us, some of which may be of a nature to identify you ("Personal Data"). This is particularly the case when you take part in one of our prize draws, contests, promotional offers, studies or surveys, when you contact us - either by telephone, email or any other means of communication - or when you report an issue to us.

The personal data collected are the following:



- Your surname and first name
- Your email address
- Your telephone number
- Your address
- Your IP address
- The name of your company
- Your country of residence
- Your CV and cover letter
- As part of the payment of products and services offered on the Platform, the latter records financial data relating to the user's credit card.
- Your answers to our surveys and questionnaires and the opinions you have left to evaluate a lesson, this information being in particular is likely to be used within the framework of statistical analyses conducted on satisfaction;
- The data we may ask you to provide when you report a problem with our platform or our services, such as the subject of your support request;

3.2 - Data we automatically collect

During each of your visits, we may collect, in accordance with the applicable legislation and with your consent, where applicable, information concerning the devices on which you use our services or the networks from which you access our services, such as and in particular, your IP addresses, connection data, types and versions of Internet browsers used, types and versions of browser plugins, systems and operating platforms, data concerning your browsing experience on our platform, including your experience on the various URL pages of our platform, the content you access or consult, the search terms used, download errors, the time taken to view certain pages, your device's advertising ID, interactions with the page and any telephone number used to contact us.

3.3 - Data retention policy

The Platform retains your data for as long as is necessary to provide its services to you, or to justify the provision of a service as required by law and as specified in the activity log, an internal document kept for this purpose.

4 - Use of data

The personal data collected from users is intended to provide and improve the Platform's services and to maintain a secure environment.

The processing that we carry out is done for the following purposes:

- Access and use of the platform by the user
- Communication and competition management
- Recruitment management



- Management of the operation and optimization of the platform
- Implementation of user assistance
- Verification, identification and authentication of data transmitted by the user
- Management of potential disagreements with users
- Organization of the terms of use of the Payment Services.

We will only process data if at least one of the following conditions is met:

- your consent to the processing operations has been obtained
- the existence of our legitimate interest, or that of a third party, which justifies us carrying out the processing of personal data concerned
- the performance of a contract between us and you which requires us to carry out the processing of personal data concerned
- we are bound by legal and regulatory obligations which require us to carry out the processing of personal data concerned.

5 - Sharing your personal data

Personal data may be shared with third parties in the following cases:

- When the user utilizes the payment services, for the implementation of these services, the platform is in relation with third party banking and financial companies with which it has concluded contracts;
- When the user publishes, in the free comment areas of the platform, information accessible to the public;
- When the user authorizes the website of a third party to access his data;
- When the platform uses the services of service providers to deliver user support, advertising and payment services. These providers have limited access to the user's data, in the context of the delivery of these services, and have a contractual obligation to use them in accordance with the provisions of the applicable regulations on the protection of data of personal nature;
- If and when required by law, the platform may carry out the communication of data to deal with complaints against the platform and comply with administrative and judicial procedures;

6 - Commercial offers

In accordance with the applicable law and with your consent where required, we may use the data you provide us with on our platforms for marketing purposes (for example to send you our newsletters or any other communication likely to interest you).

Your data may be used by our partners, which you can unsubscribe from at any time.

If, when consulting the site, you access personal data, you must refrain from any collection, any unauthorised use and any act that may constitute an infringement of the privacy or reputation of individuals. The publisher accepts no responsibility in this respect.



The data is kept and used for a period in accordance with the legislation in force and in any case for a period that cannot exceed 3 years.

7 - Transfer of your data

Personal Data is stored within the European Union. However, to the extent that some of our service providers are located in countries outside the European Union ("Third Countries"), we transfer some of your Personal Information to those countries. The countries concerned to date may include India, the Philippines and Mauritius.

In such a case, we ensure that this transfer is carried out in compliance with the applicable regulations and guarantees a sufficient level of protection of the privacy and fundamental rights of individuals, and in accordance with Article 46 of the RGD Regulation, and all our service providers are bound by a charter of commitment.

8 - Your rights on your personal data

Pursuant to the regulations applicable to personal data, users have and may exercise the following rights:

- The right of access: they can exercise their right of access, to be made aware of the personal data concerning them. In this case, before implementing this right, the platform may request proof of the user's identity in order to verify its accuracy.
- The right of rectification: if the personal data held by the platform is inaccurate, the users may request that the information be updated.
- The right to delete data: users may request the deletion of their personal data, in accordance with applicable data protection laws.
- The right to limit processing: users may ask the platform to limit the processing of personal data in accordance with the assumptions set out in the GDPR.
- The right to object to the processing of data: users may object to their data being processed in accordance with the assumptions laid down in the GDPR.
- The right to portability: they can claim that the platform gives them the personal data that provided it to transmit them to a new platform.

Users can exercise these rights by contacting us at the following address: 1to1 Consulting SAS - Horizon 2000, Mach 6 - Avenue des Hauts Grigneux - 76 420 BIHOREL, FRANCE

You may also contact our Data Protection Officer, as specified in Article 2.3.

All applications for the exercise of these rights must be accompanied by a photocopy of a valid, signed identity document and mention the address at which the publisher may contact the applicant. A reply will be sent within one month of receipt of the request. This one-month period may be extended by two months if the complexity of the application and/or the number of applications so require. Further, and in accordance to the law n°2016-1321 of October 7, 2016, the individuals who wish it, have the possibility of organising the fate of their data after their death. For more information on the subject, you can consult the CNIL website: <https://www.cnil.fr/>.

Users can also lodge a complaint with the CNIL on the CNIL website: <https://www.cnil.fr/>.

We recommend that you first contact us through the platform before filing a complaint with the CNIL, as we are at your available at any time to resolve any form of issue amicably and in a timely manner.

9 - Cookies and similar technologies



A "Cookie" or tracer is an electronic file placed on a terminal (computer, tablet, smartphone, etc) and read for example when consulting a website, an e-mail, installing or using software or a mobile application, whatever the type of terminal used (source: <https://www.cnil.fr/fr/cookies-traceurs-que-dit-la-loi>).

When browsing this site, "cookies" from the company responsible for the site concerned and/or from third companies may be placed on your terminal.

All information collected will only be used to track the volume, type and configuration of traffic using this site, to develop the design and layout and for other administrative and development purposes and more generally to improve the service we provide to you.

The following cookies are present on the site <https://7speaking.com>

1) List of cookies generated by the 1to1progress.com domain

Required for multilingual:

- `_icl_current_language` - Stores the current language
- `_icl_current_admin_language_{hash}` - Stores the current WordPress administration area language
- `_icl_visitor_lang_js` - Stores the redirected language
- `wpml_browser_redirect_test` - Tests if cookies are enabled
- `wpml_referer_url` - Stores the last requested URL on the front-end
- `wpml_admin_referer_url` - Stores the last requested URL on the back-end
- See with WPML: <https://wpml.org/documentation/support/browser-cookies-stored-wpml/>

Required for the chat (to maintain the window from one page to the other)

- `__zlcid` - store visitor's ID for widget's authentication (365 days)
- `__zlcprivacy` : store visitor's decision on CookieLaw Javascript API (365 days)
- See with Zendesk : <https://chat.zendesk.com/hc/en-us/articles/360001352868-Browser-cookies-from-Chat-widget-Web-SDK>

Optional Google Analytics tracer. See with Google: <https://support.google.com/analytics/answer/6004245>

- `_ga` - Used to distinguish users. (2 years)
- `_gat` - Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named `_dc_gtm_<property-id>`. (1 minute)
- `_gid` - Used to distinguish users. (24 hours)
- See with Google: <https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

2) List of cookies generated by the google.com domain

Required for reCaptcha:

- `1P_JAR`, `APISID`, `DV`, `HSID`, `SAPISID`, `SID`, `SSID`, `NID`, `OGP`, `OGPC`, `OTZ`, `SIDCC`, `UULE`, `_ga`

These cookies, provided by Google Inc., are used in conjunction with the Google reCAPTCHA service for account creation and login authentication. <http://www.google.com/intl/en/policies/privacy>

The following cookies are present on the platform <https://app.7speaking.com>:

7 Speaking

- ONETOONESSID: connexion Identification to the platform (24 hours)
- SpryMedia_DataTables_*: retains data table sorting preferences
- Facultatif, traceur Google Analytics

See with Google: <https://support.google.com/analytics/answer/6004245>

- _ga - Used to distinguish users. (2 years)
- _gat - Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>. (1 minute)
- _gid - Used to distinguish users. (24 hours)
- See with Google: <https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

For further information on the use, management and deletion of "cookies" for any type of browser, you may consult the following link: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

10 - Confidentiality of your password

You are responsible for the confidentiality of the password we issued for you following the creation of your account.

You agree to keep this password secret and to not share it with anyone.

11 - Links to other websites and social networks

Our platforms may occasionally reference links to the websites of our partners or third party companies. Please note that these websites have their individual privacy policies and we are not responsible for the use made by these websites or of the information collected when you click on these links. We invite you to read the privacy policies of these sites before communicating your personal data to them.

12 - Changes to our Privacy Policy

We may change this Privacy Policy periodically. When indispensable, we will inform you and/or seek your renewed consent. We recommend that you visit this page regularly to review any changes or updates to our privacy policy.

13 - Applicable law

The present conditions of use of the site are overseen by French law and subject to the jurisdiction of the courts of the registered office of the publisher, subject to a specific attribution of jurisdiction deriving from a specific legal or regulatory text.

14 – Contact

Should you have any questions about this privacy policy or if you have any questions concerning your personal data, you may contact us at:

- Send an e-mail to our Data Protection Officer at the following address: rgpd@1to1progress.com
- Or by written correspondence at the following address: 1to1 Consulting SAS - Horizon 2000, Mach 6 - Avenue des Hauts Grigneux - 76 420 BIHOREL, FRANCE

Version updated April 5th, 2023