

## Data Privacy notice - [www.episens.fr](http://www.episens.fr)

---

### PREAMBLE

As part of its activities, the Episens Division of the InVivo Group (hereinafter "Episens") makes respect for the privacy of its Internet users a real priority and brings increased vigilance to the use of personal data responsibly, in line with the principles and rules laid down by Regulation (EU) 2016/679 on the protection of personal data (hereinafter "the Regulation") and French Law No. 78-17 of 6 January 1978 relating to information technology and civil liberties as amended (hereinafter "Informatique et Libertés" Law).

The processing of personal data Episens carried out through [www.episens.fr](http://www.episens.fr) is intended to comply with the Regulations. They are part of a desire for transparency, security and control of their data for the persons concerned by the processing described below.

This online privacy policy aims to detail the different categories of personal data we carry out through this website, to present simply how we use and protect them, the legal basis on which we rely to justify this processing as well as the rights you have over your personal data.

Thank you for the time you will devote to reading this notice!

### 1. FUNDAMENTAL PRINCIPLES

In general, Episens undertakes to ensure that your personal data it processes is :

- ▶ Processed lawfully, fairly and in a transparent manner vis-à-vis the data subjects ;
- ▶ Collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ;
- ▶ Adequate, relevant and limited to what is necessary in relation to the purposes for which it was collected in application of the principle of data minimization ;
- ▶ Accurate and kept up-to-date. If any data concerning you is inaccurate, you are invited to inform us at the [rgpd@invivo-group.com](mailto:rgpd@invivo-group.com) address and to precise that your request is related to our website, so that corrections can be made ;
- ▶ Kept in a form which permits us your identification for a period that does not exceed that strictly necessary for the purposes for which your data was initially collected, this period may be extended by any legal limitation periods to which we are subject in the context of our activities ;
- ▶ Processed in such a way as to ensure the appropriate security of your personal data against destruction, accidental loss, damage, unauthorized access or unlawful processing.

### 2. SCOPE OF THIS NOTICE

This online Privacy Policy presents the terms and conditions of the data processing that Episens is required to carry out throughout your browsing on our institutional website [www.episens.fr](http://www.episens.fr) (hereinafter the "Website").

To obtain clarifications or to administer the use of cookies on our site at any time, our consent management platform is available continuously [here](#) **[attach Link cookie banner]**.

### 3. HOW WE PROCESS YOUR DATA ?

The collection of your personal data is absolutely not mandatory on our Site, but we may carry out certain processing operations with your involvement. In this context, you will find below details on the parameters that govern this processing of your data:

- ▶ The purposes (why do we collect your data?) ;
- ▶ The categories of personal data collected ;
- ▶ The legal basis (what legally entitles us to carry out this processing?) ;
- ▶ The retention period (for how long do we keep your data?)

Purpose of the processing	Categories of Personal Data	Legal basis	Retention period
Perform statistical audience measurements	Cookies	Your consent	No cookie deposit in case of refusal; Retention 13 months with your consent, or immediate deletion if consent is withdrawn.
To provide you with information about Episens' activity	Identity data, Function, Interviews	Legitimate interest in sharing information relating to Episens' professional life	Data published for a relevant period of time and regularly updated. Image rights signed for a period of 5 years.
Allowing you to contact us	Identity data, e-mail address	Your consent	2 years after the last contact with you, then deletion.
Recruitment : to allow you to apply for our job offers	Identity data, contact data, CV	The execution of pre-contractual measures taken at your request	2 years after our last contact if the procedure does not result in a contractual relationship with you ; in the meantime,

			the applicant may request the deletion of his or her data at any time.
--	--	--	--

Regarding recruitment, please note that you can access our job offers via two channels:

- ▶ **On our website in the "Join us" section:** by clicking on the "*I apply*" button on one of our job offers, you are redirected to the online platform of the InVivo Group's recruitment partner, TalentSoft, which allows us to collect your applications digitally in a secure way. Our relationship with this partner is governed by a contract that provides adequate security measures with respect to your personal information, with appropriate safeguards, verified and validated by the InVivo Group's IT Services Department.

The spontaneous application requires the creation of a candidate space on our Talentsoft page which collects the following personal information: email address, first name, last name, language, language level, CV, cover letter. This space dedicated to recruitment also has its own data protection policy, which you can consult for more information.

- ▶ **Via the LinkedIn professional platform:** By clicking on our job offers published on our "Episens by InVivo" account on LinkedIn, you are also redirected to the online platform of the InVivo Group's recruitment partner, TalentSoft, under the same conditions as set out above.

Finally, please note that by clicking on the "*Customer Account*" section of this [www.episens.fr](http://www.episens.fr) Website, you will be redirected directly to your customer account on our e-commerce platform Episens. Information relating to the processing of your personal data carried out via this platform is accessible in [its dedicated personal data protection policy](#).

## 4. WHEN DO WE COLLECT YOUR PERSONAL DATA?

The collection of your personal data is done **directly** from you and takes place:

- ▶ During your browsing on our website if you have provided your consent to cookies ;
- ▶ When you submit a contact form ;
- ▶ When recording interviews with our employees or partners ;

Your data is also collected **indirectly** when you submit an application via the InVivo Group's recruitment platform, Talentsoft, with your application and the associated personal data being transmitted to our authorized recruitment departments.

## 5. AUTOMATED DECISION-MAKING

A fully automated decision is a decision made about a person through algorithms applied to their personal data, without any human being intervening in the process. It can generate significant legal effects for data subjects, such as the impossibility of accessing a service.

Please note that we do not carry out any automated processing of personal data that provides for such legal effects on our institutional [www.episens.com](http://www.episens.com) Website.

## 6. WHAT ARE YOUR RIGHTS ?

You are in control of your data and have many rights in its management. You can ask us to exercise your following rights :

<b>ACCESS</b>	You can ask us to confirm that we are processing personal data about you and ask us for a copy of it.
<b>RECTIFICATION</b>	You can ask us to rectify or amend personal data about you that is no longer up-to-date, inaccurate or incomplete. Please note, however, that as far as recruitment is concerned, you can directly rectify your profile and data by accessing your Candidate account
<b>OPPOSITION</b>	You can object to the collection and use of your data.
<b>WITHDRAWAL OF CONSENT</b>	If you have provided us with your consent, it is reversible and you can withdraw it at any time, immediately stopping the processing in question.
<b>ERASURE</b>	You can ask us to delete your personal data when you withdraw your consent, exercise your right to object or if the data lapses.
<b>RESTRICTION OF PROCESSING</b>	You can obtain the temporary restriction of processing if you contest the accuracy of the data or the lawfulness of the processing.
<b>DIGITAL DEATH</b>	Applicable to French citizens, you can define, during your lifetime, guidelines relating to the retention, erasure and communication of your personal data after your death. These guidelines may be changed or revoked at any time. In the absence of such guidelines, your data will be deleted within the legal deadlines. Your heirs will be able to exercise their rights over your data and in particular request its deletion.

If you wish to exercise any of your rights in accordance with data protection regulations, or in the unfortunate event that you become aware of a non-compliance or failure in the processing of your personal data, you can send your request through the following channels:

- By post, to the following address:  
Episens by Invivo  
7 Quai de l'apport Paris  
91 000 Corbeil-Essonnes

- ▶ However, to ensure a faster processing of your request, we advise you to send us your request digitally to the dedicated address [rgpd@invivo-group.com](mailto:rgpd@invivo-group.com).

In addition, you can lodge a complaint with the supervisory authority of the Member State in which you reside as your main occupation, at your place of work or where the non-compliance or breach of your personal data has been committed. In France, we invite you to consult the website of the Commission Nationale de l'Informatique et des Libertés ([www.cnil.fr](http://www.cnil.fr)) for additional information on your rights to appeal and the procedure required, or to send your request to them at the following address: **Commission nationale de l'informatique et des libertés (CNIL), 3 Place de Fontenoy - TSA 80715, 75334 PARIS CEDEX 07.**

From the date of receipt of your request to exercise your right, we have a response period of 1 month, which we may extend by an additional 2 months if the complexity of the request requires it.

Please note that a request to exercise a right can only concern your own personal data (with the exception of a delegation obtained in a directive issued in the context of the right to digital death); It may also be rejected in certain specific cases (law not applicable by virtue of the legal basis applicable to the processing, compliance with an obligation of confidentiality, manifestly abusive request, etc.) or require you to assure us that you are the data subject (request for additional information).

In any case, you will be informed as soon as possible to ensure a smooth and fastest possible processing of your request.

## 7. WHO IS LIKELY TO HAVE ACCESS TO YOUR PERSONAL DATA ?

### Recipients of your data

The data we collect is communicated to our authorized staff, to any entity that is part of the InVivo group and to the subcontractors we use in the course of our activity. We never transfer your personal data to third parties who are not authorized or who do not meet the requirements of the Regulations in force.

### Data transfers outside the European Union

We use the Google Analytics audience measurement service, which collects information about your browsing on our Site, with your consent. This service is published by Google LLC based in Mountain View, United States, a [certified company under the EU-US Data Privacy Framework](#), which regulates measures considered equivalent to the GDPR by the European authorities.

Apart from this service, your data is processed within the European Union and in all cases benefits from a very high level of protection and confidentiality.

If, however, your data is to be processed in the future by a processor or a recipient located outside the European Economic Area whose country of establishment is not considered to provide an

adequate level of protection within the meaning of Article 45 of the GDPR, we undertake to guarantee the protection of your personal data in accordance with the strictest rules, in particular through signature, on a case-by-case basis, contractual clauses based on the European Commission's model, or any other GDPR-compliant mechanism.

## 8. UPDATE OF THIS NOTICE

In a process of continuous improvement and transparency towards you, we reserve the right, at any time, to modify this Data Privacy notice relating to the processing of your personal data online.

We therefore encourage you to refer to this document on a regular basis for your enlightened information, and thank you for your trust in this regard!

We sincerely hope that this notice answers all the questions you may have, if not, do not hesitate to contact our DPO at the contact details mentioned in point 6 above. Congratulations for your vigilance with regard to your personal data, we wish you a pleasant visit to our website!