











Personal data protection policy

DATA CONTROLLER:

YOUR DATA IS COLLECTED BY:

ESCP: ÉTABLISSEMENT D'ENSEIGNEMENT SUPÉRIEUR CONSULAIRE (EESC), Consular non-profit Institution of Higher Education capitalized at 8.694.000 euros, registered at the trade company register of Paris under the number 824 644 587, located at 3, rue Armand Moisant 75015 Paris, and represented by Frank Bournois, Executive President and Dean.

DATA COLLECTED AND PURPOSE OF THE PROCESSING IF YOU ARE:

A visitor of the ESCP website	
A participant at an ESCP event	
A prospect	
An applicant	
A student or participant	
A staff or faculty member	
Applying for a job at ESCP	
A company representative, partner, or subcontractor	

Visitor of the Website	
Data collected:	<ul style="list-style-type: none">- IP Address- Location of network See the cookies part of our privacy policy
Purposes:	<ul style="list-style-type: none">- Improve information that we provide on our site- Improve operations on tasks such as registration at one of ESCP's events

Participants at ESCP event	
Data collected:	<ul style="list-style-type: none"> - Last Name - First Name - Email address - Company/ Faculty/ School/ Organism - Function/Position
Purposes:	<ul style="list-style-type: none"> - Management of invitations and logistical organisation for the event - Counting registered participants - Inform participants on the event (schedule modification, cancelling...)

Prospects	
Data collected:	<ul style="list-style-type: none"> - Last Name - First Name - Gender - Title - Email address - Phone number - Commercial ID - Hobbies - Date of birth - City - Country of residence - Nationality - Address - Home phone number - Academic - Highest diploma - Area of study - Country of previous studies - Choice of programs - Other application, schools - Years of professional experience - Position - Company
Purposes:	<ul style="list-style-type: none"> - Marketing operations based on the consent of the person concerned

	<ul style="list-style-type: none"> - Selections of people to carry out operations such as prospection, loyalty, research - Production statistics (trade...) - Handover, rental or exchange of client or prospect files to the various ESCP campuses or to commercial and academic partners - Management of requests for access, rectification, and opposition rights
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Candidates	
Data collected:	<ul style="list-style-type: none"> - First Name - Last Name - Gender - Title - Email address - Phone number - Country of residence - Commercial ID - Hobbies - Date of Birth - City - Nationality - Address - Home Phone number - Start of Academic term - Highest Degree - Country of previous studies - Program choices - Other applications - Years of experience - Function/Job - Company
Purposes:	<ul style="list-style-type: none"> - Marketing operations based on the consent of the person concerned - Processing operations related to client relationship management and, in particular, relating to technical prospecting operations (including technical operations such as normalization, standardization, improvement and deduplication) - Selections of people to carry out operations such as prospection, loyalty, research - Production statistics (trade...)

	<ul style="list-style-type: none"> - Handover, rental or exchange of its client or prospect files to the various ESCP campuses or to all commercial and academic partners - Management of requests for access, rectification, and opposition rights
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Students, Participants	
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Data collected:	<ul style="list-style-type: none"> - Title - Last Name - First Name - Email address - Date of birth - Address - Nationality - Phone number - Resume - Grades and previous degrees - Socio-professional category - Data relating to means of payment: bank details, check number and or credit card, credit card date of expiration - Transaction number, detail on subscribe services - Contractual relation historic - ID picture <p>Specific to online course and online proctoring</p> <ul style="list-style-type: none"> - Video footage - Sound - Identification information - Account credentials - Account User Data - Session settings
Purposes:	<ul style="list-style-type: none"> - Creation of an account on ESCP's digital tools - Acquisition of services - Application and Admission management - Student enrolment and education management - Communications management and exchanges follow-up - Preparation and dissemination of student directories - Billing - Contractual relationship follow-up - Outstanding and disputes management

	<ul style="list-style-type: none"> - Management of consents and authorization concerning the use of data - Sending of newsletters and commercial solicitations especially through electronic means - Transmission to partners and subcontractors taking part in the education - Compliance with applicable legal and required obligations, and especially with transmission data requests by public authorities and administrations - Transmission to the Alumni Association and the ESCP Foundation - Transmission to partners in charge of processing and awarding degrees - Transmission of data to companies and especially the resume; - personal data transmission to certification and ranking organizations and agencies - Management to avoid fraud risks - Processing necessary for the legitimate interests pursued by ESCP (Article 6f) and recital 47 of the GDPR. <p>Specific to online course and online proctoring</p> <ul style="list-style-type: none"> - To remotely identify test-takers - To monitor the exam process
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Collaborators	
Data collected:	Contact the HR department or dataprotection@escp.eu
Purposes:	
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Applicants for a job position at ESCP	
Data collected:	<ul style="list-style-type: none"> - First Name - Last Name - Email address - Resume
Purposes:	<ul style="list-style-type: none"> - Application process - Management of recruitment procedures - Reply to job applicants and intern applicants - Management of disputes
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Company representatives, partners, or subcontractors	
Data collected:	<ul style="list-style-type: none"> - Title - Last Name - First Name - Email address - Company - Position - Phone number
Purposes::	<ul style="list-style-type: none"> - Related to the contractual relationship

DATA COLLECTION:

The data are collected by ESCP during the following operations and processes:

- When navigating on ESCP Business School websites or landing pages
- When creating an account or a personal space on ESCP Business School websites
- When an information request is made
- When documentation is requested or downloaded (brochure, flyer, information leaflet...)
- When ordering products or services
- When registering using any ESCP Business School form
- During a marketing campaign

DATA TRANSMISSION AND/OR DESTINATION:

Data may be transmitted especially to:

Partners	Legal basis	Data subject		
ESCP campuses	Contract			
Foundation	Contract, consent			
Alumni	Contract, consent			

Ministère de l'éducation nationale Ministre of Education	Legal requirement	Blue bar	Green bar						
Conférence des Grandes Ecoles CGE	Consent	Blue bar							
Accreditations, Rankings	Contract, consent	Blue bar							
Partners, pedagogic processors	Contract, consent	Blue bar	Dark blue bar	Green bar					
Partners, technical processors	Contract, consent	Red bar	Orange bar	Purple bar	Light blue bar	Blue bar	Dark blue bar	Light green bar	Dark green bar
Partners, marketing communication processors	Contract, consent	Light blue bar	Blue bar	Dark blue bar	Purple bar				

If data are transmitted outside the European Economic Area, ESCP shall ensure that the processing of such data is carried out in accordance with the applicable personal data policy (GDPR)

DATA RETENTION PERIODS:

ESCP keeps personal data for the time necessary to achieve the purposes specified above, as well as to comply with its legal and required obligations.

For informational purposes:

Retention period of personal data	
Registration files (personal information, copy of degree, titles and works...) of the student	8 years from registration
Grades, degrees, and results obtained	50 years after the test or graduation

Documents produced by the student, internship reports, and proof copies	1 year from tests
Student's thesis	5 years
Data concerning a third-party payer	3 years from the last payment made
Identity document transmitted as part of the right of access, modification, and deletion	1 year from the receipt
Data concerning an applicant not becoming a student of ESCP	3 years from the data communication
Data concerning a prospect	3 years from the data communication

DATA HOSTING:

The different categories of data collected and processed by ESCP are mostly hosted in the European Union.

ESCP takes all the necessary measures to ensure the security of the data hosted outside the European Union like signing standard contractual clauses for the transfer of personal data to third countries.

DATA PROTECTION / SECURITY:

ESCP protects personal data, using secured digital tools.

ESCP and its subcontractors comply with the security standards, especially when processing credit card payments.

ESCP implements electronics security measures and procedures to ensure security risks concerning the collection, storage, retention, and transmission of personal data.



ACCESS, MODIFICATION AND DELETION RIGHTS:

In accordance with the law of the 6 January 1978 related to data processing, files and liberties, people have a right to access, modify, oppose and delete their personal data by writing to the following address:

- By post: SERVICE DATA PROTECTION OFFICER – ESCP, 3, rue Armand Moisant, 75015 Paris
- By e-mail: dataprotection@escpeurope.eu

This request must be signed and accompanied by photocopy of an identity card bearing the signature of the holder and specify the address to which the response must be sent. A response will then be sent to the applicant within 1 month of receiving the request.

If, despite our response, you were not satisfied, you have the possibility to contact the CNIL directly at the following address
<https://www.cnil.fr/en/contact-cnil>.

***IMPORTANT INFORMATION:**

- It is specified that the data required for the education must be kept. If the student exercises his/her right to delete data concerning himself/herself before the end of his/her education, he/she will be alerted by the ESCP's services. If the student confirms his/her wish concerning this deletion, he/she will be deemed to have purely and simply renounced his/her education and will be considered to have resigned.
- It is specified that the data needed to finance schooling must be kept. If the student or the third-party payer exercises his/her right to delete data concerning himself/herself before the end of his/her education or before the end of the financing of his/her education, the student or the third-party payer will be alerted by the ESCP's services. If he/she confirms his/her wish concerning this deletion, all amount still due will become immediately payable, despite any payment by instalments agreement. Failure to pay will result in suspension of schooling.
- Each person concerned by the processing of his/her data has a right to the portability of the data he/she has transmitted.
- This right applies under the same conditions as the right of access and rectification.



COOKIES:

A cookie is a data placed on the hard disk by the server of ESCP's websites. This data may be stored on the data subject's terminal in a simple text file, to which a server accesses to read and record information.

ESCP's websites can only read or write cookies that belong to them.

These cookies allow, in particular, to:

- Recognize the browser during the visit(s);
- Link an action to the provision of the requested service;
- Record the language spoken or other preferences needed to provide the requested service;
- Ensure load balancing and manage traffic;
- Follow the website audience;
- Develop statistical analyses
- Suggest commercial offers related or not to your interests

Anyone using ESCP's websites can make his/her choices regarding the use of cookies.

If you contribute to social networks, they may activate their own cookies.

To manage cookies on different browsers:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=fr>

Internet Explorer: <https://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies#ie=ie-11>

Mozilla Firefox: <https://support.mozilla.org/fr/kb/effacer-cookies-supprimer-infos-sites-enregistrees>

Safari: <https://support.apple.com/kb/ht1677?viewlocale=frFR&locale=frFR>

The settings are likely to have an impact on internet browsing and on the operation of certain services requiring the use of cookies.

For any additional information on cookies, the French National Commission for Information Technology and Civil Liberties (CNIL) has upload an explanatory notice: <https://www.cnil.fr/vos-droits/vos-traces/les-cookies/>

COVID-19 MEASURES

Data collected as part of the exceptional measures related to covid-19 (test results)	
Students tested positive	Close Contact students
<ul style="list-style-type: none"> - First Name, Last Name - Phone Number - Email - Address - Student card number - Social Security Number - Health data (date of early symptoms, medical results of the Covid test, if you have been contacted by the CPAM (Caisse Primaire d'Assurance Maladie)) 	<ul style="list-style-type: none"> - First Name, Last Name - Phone Number - Email
Transfer to third parties	Data retention period
<ul style="list-style-type: none"> - ARS - Caisse Primaire d'Assurance Maladie (CPAM) 	1 month