



Personal Data Protection Policy

Data controller:

Your data is collected by:

ESCP Europe, "Etablissement d'Enseignement Supérieur Consulaire (EESC)", Consular non-profit Institution for 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,

Represented by Frank Bournois, Executive President and Dean.

The personal data collected by ESCP Europe:

As part of its relationship with various groups of people, ESCP Europe collects information such as:

*In a general way:

- Title;
- Name;
- First name(s);
- E-mail address;
- Documentation requests;
- Services requests;

*For applicants, students, clients, and third-party payers:

- Birth Date;
- Postal address;
- Nationality;
- Phone number(s);
- Resume (students and clients only);
- Prior grades and degrees;
- Socio-professional category;
- Data relating to means of payment: postal or bank identity statement, check and/or credit card number, credit card expiry date;
- Transaction data: transaction number, service subscription detail;
- History of the contractual relationship;
- Students' photos.

*For graduates:

- Degrees awarded;
- Grades obtained;



*For companies, partners, and subcontractors:

- Name;
- Legal status;
- Share capital;
- Head Office Address;
- Staff;
- Data relating to means of payment: postal or bank identity statement, check and/or credit card number, credit card expiry date;
- Transaction data: transaction number, service subscription detail;
- History of the contractual relationship.

*For corporate representatives, partners and subcontractors:

- Title;
- Name;
- First name(s);
- E-mail address;
- Company;
- Function/Job;
- Phone number.

Purposes of processing personal data:

*Business development management:

- Fulfilment of marketing operations based on the consent of the person concerned;
- Fulfilment of processing operations related to client relationship management and in particular those 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, researches
- Production statistics (trade...)
- Handover, rental or exchange of its client or prospect files to the various ESCP Europe campuses or to all commercial and academic partners;
- Management of requests for access, rectification and opposition rights;

*Contractual relationship management:

- Creation of an account on ESCP Europe'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;
- Out standings and disputes management;
- 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 Europe 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 Europe (Article 6f) and recital 47 of the GDPR.

Data collection:

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

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

ESCP Europe may collect data directly or indirectly.

ESCP Europe may also obtain data from a third party or from a partner. In this case, ESCP Europe only receives data from entities complying with the GDPR and whose data subjects have consented to the transmission, processing and use of data by ESCP Europe.

Data transmission and/or destination:

Data may be transmitted especially:

- To all ESCP Europe campuses, entities subjected to the GDPR provisions and which apply the same operating methods and data processing as ESCP Europe;
- To academic partners within or outside the European Economic Area who are involved in the education of people concerned by data processing;
- To its educational or technical subcontractors who have access to the personal information required for the performance of their services and who are not authorised to use them for other purposes. In addition, they are required to treat such personal information in accordance with applicable personal data protection policy (GDPR);
- To any third party if such transmission is essential in the context of the contractual relationship;
- To administrations and/or public authorities in accordance with the legal and required obligations.

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

Data retention periods:

ESCP Europe 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 information purposes only:

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 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 date of receipt
Data concerning an applicant not becoming a student of ESCP Europe	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 Europe are hosted in the European Union.

If these data were to be hosted outside the European Union, ESCP Europe would take all necessary measures to ensure the security of data transmitted.

Data protection / Security

ESCP Europe protects personal data, using secured digital tools.

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

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

This request must be signed and accompanied by the photocopy of an identity card bearing the signature of the holder, and specify the address where the response must be sent. A response will then be sent to the applicant within 2 months of receiving the request.



***Important information:**

- It is specified that the data required for the students' 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 ESCP Europe. 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 ESCP Europe. If he/she confirms his/her wish concerning this deletion, all amounts still due will become immediately payable, despite any agreement for payment in instalments. Failure to pay will result in suspension of schooling.

Finally, 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

Cookies are data placed on the hard disk by the server of ESCP Europe'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 Europe'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 Europe'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.

or 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/>