

Personal data - Privacy policy

In accordance with article 7-1 of law n°18-17 of January 6, 1978 relating to computing, files and freedoms, a minor from the age of 15 can consent independently to data processing of a personal nature.

The personal information you share with us is kept secure in order to offer you the best possible service.

The purpose of this personal data protection policy is to inform you of how we process your data.

1. Name and address of the Data Manager

The person responsible for processing your data, within the meaning of the regulations on the protection of data, is the company Provocom Formation SAS whose head office is located at 10 avenue Gustave Eiffel 28000 Chartres, reachable for the purposes hereof at the following email address: andjoys@langues-strategies.fr

2. Name and address of the data protection officer

The personal data protection officer can be contacted at the following postal address:

To the attention of the Data Protection Officer, Provocom Formation SAS / Langues Stratégies,
10 avenue Gustave Eiffel 28000 Chartres

Or at the following email address: andjoys@langues-strategies.fr

3. Purposes of processing

The information or data collected on this platform (including the website <https://www.andjoys.com> and the mobile application) are used to facilitate access to language learning via a specific platform - ANDJOYS - as well as for assessment purposes.

No data is used for commercial prospecting, advertising or marketing purposes.

4. The legal basis of the processing

We use your data only on the basis of your consent with regard to monitoring your learning.

5. Terms of processing personal data on the ANDJOYS platform

5.1 Access and retention of data

Only employees of the Languages Strategies department of the company Provocom Formation SAS, a possible trainer and the service providers integrated into the platform and mentioned below have access to your data :

MATOMO, which allows you to analyze the platform's audience. <https://matomo.org/contact/>

The data is kept for one year and is not shared with other people or entities other than Provocom Formation SAS. Personal data is not transferred outside the Union

European.

5.2 Your user account

By creating a user account on the ANDJOYS platform, the User accepts the terms of the contract as provided for in the General Conditions of Use for the processing of their data. The latter are used to allow the User to take full advantage of the services and features offered by the platform.

When you create a user account on our platform, the following data is recorded in order to perform the requested service (i.e. learning one or more languages foreigners):

- Last name First Name
- Connection data (username, password, email)
- Language level
- Learning motivations
- Training data

5.3. Our exchanges via contact forms

On the ANDJOYS platform there are two contact forms (a contact form for training and a form accessible after creating the account in order to communicate with us on a problem encountered when using the platform or to suggest an improvement to us.)

To this end, you tell us:

- With the first contact form: your Username, your Email address, the Subject, your Message, function, telephone number, information about the establishment or third party organization
- For the second contact form: your Username, your Email address, the Subject, your Message.

The data processed in this context is with your consent and so that we can answer any questions you have. Your personal data is deleted as soon as it is no longer essential for the purposes of its collection, i.e. when the circumstances allow us to determine with certainty that the subject of our exchange has been definitively concluded.

6. Data security

We implement technical and organizational measures to protect your data, such as physical security and access control procedures.

We require our employees to respect strict working methods in terms of safety and protection of information, including contractual obligations under which they undertake to ensure the confidentiality of personal data and to apply measures rigorous in terms of data transfer.

The data collected as part of the ANDJOYS platform is not subject to any transfer outside the European Union.

7. Privacy

Your personal data is used by our employees for the proper execution of the services that you have requested and to strengthen and personalize communication between our services and you.

We do not communicate your personal information to third parties, except to service providers expressly described in this policy. Communication of data to our service providers only applies for specific purposes.

We do not give or sell your information. We do not disclose any of your information except if we have your consent or if this is required by law or regulation.

8. Your rights relating to the processing of your data

In accordance with the "Informatique et Libertés" law, you have the right to access, rectify and erase your data, as well as the right to object or request limitation of processing to which they are subject. You also have the right to portability of your data, where applicable.

Just make the request to dpo@langues-strategies.fr or by postal mail to the attention of the Manager of data protection Provocom Training / Languages Strategies, 10 avenue Gustave Eiffel 28000 Chartres, specifying last name, first name and address and providing proof of your identity.

Visit the cnil.fr website for more information on your rights. If you think, after having

Contacted us, that your "Computer and Liberties" rights are not respected, you can send a complaint to the CNIL:

<https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-queles-conditions-et-comment>

9. Cookies on the ANDJOYS platform

The ANDJOYS platform requires the use of cookies. By connecting to our platform, you consent that cookies may be placed on your device.

These cookies are used for the proper functioning of the platform, user accounts and for the execution of the services offered. Cookies correspond to small files of letters and symbols downloaded to your terminal when you access the platform.

To improve your experience, our cookies are essential for using the platform. If your browser is configured to refuse all cookies, you will not be able to take full advantage of the services. Cookies placed on the platform may be placed by the data controller or by third parties.

The data controller uses two (2) categories of cookies whose purposes are described below.

After :

9.1 MATOMO statistics and audience measurement cookies

In order to better serve you and improve the user experience on our platform, we use MATOMO navigation analysis and Internet audience measurement cookies.

Information relating to your use of the platform (including your IP address, only for the first connection) generated by these cookies are transmitted to a server located in France and are stored there.

The sole purpose of these cookies is to measure the audience of the platform's pages, in order to allow an evaluation of the published content and the ergonomics of the platform.

The use of the cookies is strictly limited to the production of anonymous statistics for Audience figures. The use of these cookies does not allow the identification of individuals. The data collected is therefore not combined with other processing of personal data.

MATOMO cookies:

Name	Cookies	Purpose
MATOMO	Changes in progress	Platform audience measurement

The expiration date of MATOMO cookies is a maximum of thirteen (13) months from the date of their first insertion.

You can deactivate the setting of these navigation analysis and audience measurement cookies.

However, if you do so, you will not be able to use all of the features of the platform.

You can obtain more information about the analytical cookies placed by MATOMO, and in particular how to deactivate them, by following the links below:

- Cookie information: https://matomo.org/faq/general/faq_146/

- Disabling cookies: https://matomo.org/faq/general/faq_157/

9.2 Operational cookies

These cookies concern (i) authentication on the platform (ii) user preferences (interface language, communication methods). No functionality cookies can be disabled.

Cookies ANDJOYS :

Name	Cookies	Purpose
ANDJOYS	browser_lang	Identify the browser language
ANDJOYS	anon_lang	Memorise the interface language of an anonymous user
ANDJOYS	cc	Detect country
ANDJOYS	Device	Detect the user's digital device
ANDJOYS	hovertranslate_enabled	Remember the status for the word-by-word translation
ANDJOYS	lang	Save the interface language of the registered user
ANDJOYS	SESS19d290db31922f72dfe1c0623cbb434a	Authenticate registered user
ANDJOYS	sp_mute	Memorise the sound volume for games
ANDJOYS	arp_scroll_position	Temporarily store the position when scrolling the window
ANDJOYS	has_js	Remember status for the activation of Javascript

The expiration date of ANDJOYS cookies is a maximum of thirteen (13) months from their first date of insertion.

9.3 Cookie management

You have different ways to manage your cookies. You can restrict or disable the use of cookies by changing your browser settings. No operational cookies can be deactivated. We remind you that the configuration is likely to modify your access to our services which requires the use of cookies.

9.4 Configuring your browser

Most browsers accept cookies by default. However, you can decide to block these cookies or ask your browser to notify you when a site attempts to implement a cookie on your terminal.

To change the management of cookies in your browser, you can modify the settings in the privacy tab.

Please note, certain features of the platform may no longer work. The configuration of every browser is different. It is described in the help menu of your browser, which will allow you to know how to modify your cookie preferences.

For Chrome:<https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>

For FireFox:<https://support.mozilla.org/fr/kb/cookies-informations-sites-enregistrent?redirectlocale=fr&redirectslug=Gérer+les+cookie>

For Opera:<https://www.accepterlescookies.com/comment-accepter-les-cookies-sur-opera.html>

For Safari :<https://support.apple.com/fr-fr/guide/safari/sfri11471/mac>