

## PRIVACY POLICY OF COACHING ACROSS BORDERS

Coaching Across Borders offers coaching and consulting services. Coaching Across Borders may collect personally identifiable information about you ("Personal Information" or "Information") in connection with these services.

This Privacy Policy (the "Policy") describes our privacy practices regarding the collection, use, transfer and protection of Personal Information collected by Coaching Across Borders in connection with our coaching and consulting services (the "Services"), including Information collected offline and through our web sites, including [www.coaching-ab.com](http://www.coaching-ab.com) and [www.blog.fabiennetailleur.com](http://www.blog.fabiennetailleur.com) (collectively, the "Site"). This Policy also aims to tell you about your legal rights under the applicable personal data protection legislation.

By using this Site, you accept the terms of this Policy.

The Site is not intended for children and Coaching Across Borders does not knowingly collect data relating to children.

This Policy is issued on behalf of Coaching Across Borders, therefore any reference to "we", "us" or "our" shall be taken as references to Coaching Across Borders.

Pursuant to applicable law, Coaching Across Borders is the controller and responsible for the Site and processing your Information.

Coaching Across Borders is the trade name of Fabienne Tailleur SAS, a French société par actions simplifiée à associé unique, registered with the Trade and Companies Register of Paris under the number 805 107 323 having its registered office at 65 rue des Cascades 75020 Paris.

If you have any queries concerning this Policy, including any requests to exercise your legal rights, please contact us using the details set out below:

[info@coaching-ab.com](mailto:info@coaching-ab.com)

### 1. INFORMATION COLLECTED BY COACHING ACROSS BORDERS

Coaching Across Borders collects Personal Information about you (such as name, e-mail address, postal address and phone number) when you provide it to us, including, for example, when you register to use our Site, provide Information about yourself to our coaches or contact us via e-mail.

In the course of its Services, Coaching Across Borders may also collect the following Personal Information about potential participants: name, citizenship, telephone number, e-mail address, postal address, CV Information (e.g. skills, employment history, professional credentials, memberships in organizations (excluding trade unions and political organizations), education), Information from previous employers and other Information to the extent Coaching Across Borders has acquired or the individual has provided Coaching Across Borders with such Information.

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so. You permit us to use the Information in accordance with this Policy.

Coaching Across Borders does not collect any special categories of personal data within the meaning of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "General Data Protection Regulation" or "GDPR") (this includes information about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union memberships, and information about your health and genetic and biometric data).

### 2. OTHER INFORMATION COACHING ACROSS BORDERS MAY COLLECT.

Coaching Across Borders and its third party service provider may collect other Information such as:

- Information collected through cookies, pixel tags and other technologies;

- Demographic Information (i.e. Tracking Data); and
  - Aggregated Information
- (collectively “Other Information”)

### 2.1 Using cookies.

Coaching Across Borders may use “cookies”. In such a latter case, Coaching Across Borders’ cookies will be read by Coaching Across Borders’ servers only. Coaching Across Borders’ cookies will not execute any code or virus. Coaching Across Borders and its service providers will use the Information for security and tracking purposes, to display Information more effectively, to facilitate and personalize your navigation experience while using the Site. Coaching Across Borders may also gather statistical information about the usage of the Site in order to understand how the Site is used, improve the design and functionality and resolve questions regarding the Site.

You can configure your browser to automatically decline cookies, or be given the choice of accepting or declining the transfer to your computer of a specific cookie or cookies from a specific site. However, if you decline these cookies, you may experience some inconvenience when using the Site.

### 2.2 Tracking data.

Coaching Across Borders logs “Tracking Data” in order to monitor visitor navigation patterns through the Site. Tracking Data is collected from each Site visitor and may include your “IP Address”, your operating system and browser type, the referring website, the pages of the Site you visited, the order in which you visited these pages and which hyperlinks you “clicked.”

Coaching Across Borders uses Tracking Data to analyze visitors’ collective behavior and characteristics, as well as interests and demographics related to particular areas of the Site.

### 2.3 By aggregating Information.

Aggregated Personal Information does not personally identify you or any visitor of the Site. For instance, Coaching Across Borders may aggregate Information to measure the gender distribution of participants in the Services.

## 3. HOW COACHING ACROSS BORDERS USES THE INFORMATION COLLECTED.

Coaching Across Borders will only use your Personal Information if there is a reason for doing so, and if that reason is permitted under applicable data protection legislation. Accordingly, Coaching Across Borders will use the Information in the following circumstances:

- a. where Coaching Across Borders has your consent. Please note that you have the right to withdraw your consent at any time by contacting us;
- b. where Coaching Across Borders needs to perform the contract we are about to enter into or have entered into with you in order to provide our Services; and
- c. where it is necessary for Coaching Across Borders’ legitimate interests or those of a third party and your interests and fundamental rights and freedoms do not override those interests; and
- d. where Coaching Across Borders needs to comply with a legal obligation.

If you do not provide certain Information when requested, Coaching Across borders may not be able to perform the Services.

As a result, Coaching Across Borders uses the Information collected in support of the Services in the main following ways:

### 3.1 Informational communications.

Coaching Across Borders may from time to time send information regarding the Services. Coaching Across Borders may also use Personal Information including e-mail address or postal address to conduct surveys. Occasionally, and with your consent, Coaching Across Borders may use your Personal Information in press releases and/or direct marketing materials.

### 3.2 Business purposes.

Coaching Across Borders may use Personal Information for the purpose of its business, such as internal communication regarding participants and clients, determining the effectiveness of its promotional activities, administering its services, and maintaining and securing its infrastructure.

### 3.3 Fulfilling your requests.

Coaching Across Borders may use Personal Information in order to reply to your inquiries and fulfill your requests. When you contact Coaching Across Borders, Coaching Across Borders may keep a record of your contact Information and your messages. Coaching Across Borders may use any Information you provide in your correspondence to respond to your inquiries and fulfill your requests.

### 3.4 Administrative Information.

Coaching Across Borders may periodically use Personal Information to send you information regarding the Site. Coaching Across Borders may also contact you periodically to check that the Personal Information collected about you is accurate and up to date. Please keep us informed if your Personal Information changes during your relationship with us.

## 4. DISCLOSURE TO THIRD PARTIES.

### 4.1 Disclosure to our network of independent coaches and business partners.

In the course of the Services, Coaching Across Borders may disclose your Personal Information to the extent necessary to its network of independent coaches and business partners for the provision of the Services. Coaching Across Borders may jointly use Personal Information with its network of independent coaches and business partners. Coaching Across Borders is responsible for managing such jointly-used Personal Information.

### 4.2 Disclosure to service providers.

Coaching Across Borders works with third parties who provide services that include website hosting, IT consulting, back-up and security services; data analysis; public relations services; attorneys, accountants, payroll services and other administrative services. As part of providing such services and to the extent necessary, these third parties will be granted access to Personal Information.

### 4.3 Business transfers.

Coaching Across Borders reserves the right to transfer or disclose Personal Information collected from visitors, or in connection with the Services, to a third party in the context of a strategic alliance with such third party, in the event of a merger involving our business, or in connection with a sale or transfer of assets of any part of our business.

### 4.4 Other disclosures.

Coaching Across Borders may also - to the extent that is reasonably necessary - use or disclose Personal Information in order to comply with applicable laws and respond to inquiries or requests from legal, public or government authorities, including those outside of your country of residence. Coaching Across Borders cannot and do not assume any responsibility for the actions or omissions of third parties,

such as clients, including the manner in which they use Personal Information received either from Coaching Across Borders or from other independent sources.

#### 5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.

Your Personal Information may be collected, used, processed, disclosed and transferred to and within France and other countries where Coaching Across Borders has facilities or in which Coaching Across Borders engages service providers. Such international transfers shall only be carried out in accordance with applicable data protection legislation.

To that effect, Coaching Across Borders will ensure that whenever your Personal Information is transferred outside the European Economic Area (EEA), a similar degree of protection is afforded to it by ensuring one of the following safeguards:

- a. the Information is transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- b. Coaching Across Borders uses the standard contractual clauses adopted by the European Commission; or
- c. where the Personal Information is transferred to third party providers based in the United States, such Information may be transferred to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EU and the US.

#### 6. SECURITY.

Coaching Across Borders has put in place appropriate security measures to protect against the alteration, loss, disclose or misuse of your Personal Information. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, no security system or system of transferring Personal Information over the Internet can be guaranteed to be fully secure.

As a result, Coaching Across Borders has also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### 7. RETENTION PERIODS.

Coaching Across Borders will not retain your Personal Information for any longer than the period necessary to fulfill the purposes outlined in this Policy including the purposes of satisfying any legal or accounting or contractual obligations.

To determine the appropriate retention period for Personal Information, Coaching Across Borders consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which your Personal Information is processed and whether those purposes can be achieved through other means, and the applicable legal requirements.

At the end of the retention period, Coaching Across Borders will erase your Personal Information without undue delay in a manner designed to ensure that it cannot be reconstructed or read.

#### 8. YOUR LEGAL RIGHTS

Under applicable data protection legislation, you may have a number of rights to your Personal Information. If you wish to exercise any of the rights set out below, please contact us.

Coaching Across Borders may need to request specific information from you to confirm your identity and ensure your right to access your Personal Information or to exercise any of your other rights. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. Coaching Across Borders may also contact you to ask you for further information in relation to your request to speed up our response.

Coaching Across Borders will respond to all legitimate requests without undue delay and in any event within one month of receipt of the request. Occasionally it may take Coaching Across Borders longer than a month, but without exceeding three months, if your request is particularly complex or you have made a number of requests. In this case, Coaching Across Borders will notify you and keep you updated.

You will not have to pay a fee to access your Personal Information or to exercise any of the other rights. However, Coaching Across Borders may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, Coaching Across Borders may refuse to comply with your request in these circumstances.

### 8.1 Right of access

You have the right to obtain from Coaching Across Borders confirmation as to whether or not your Personal Information are being processed and where that is the case to obtain a copy of the Personal Information undergoing processing in order to check that Coaching Across Borders is using your Information in accordance with data protection legislation.

### 8.2 Right to rectification

You are entitled to have your Information corrected if it is inaccurate or incomplete.

### 8.3 Right to erasure

This right is also known as “the right to be forgotten”. It enables you to ask Coaching Across Borders to delete or remove your Personal Information (a) where there is no good reason for us continuing to process it or (b) where you have withdrawn your consent on which the processing was based. You also have the right to ask Coaching Across Borders to delete or remove your Personal information (c) where you have successfully exercised your right to object to processing as referenced in section 8.7 below, (d) where Coaching Across Borders may have processed your Information unlawfully or (e) where Coaching Across Borders is required to erase your Personal Information to comply with applicable law. Note, however, that Coaching Across Borders may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

### 8.4 Right to restriction of processing

You are entitled to ask Coaching Across Borders to suspend the processing of your Personal Information in the following cases: (a) the accuracy of the Personal Information is being contested and you request it to be restricted while Coaching Across Borders verify its accuracy; (b) when it has been determined that the processing of your Personal Information is unlawful and you oppose the erasure of your Personal Information, requesting instead the restriction of its use; (c) when Coaching Across Borders no longer requires the Personal Information for the purpose of processing, but you need it to be kept for the establishment, exercise or defence of a legal claim; (d) when you have objected to processing pursuant to section 8.7 below, pending the verification whether the legitimate grounds of Coaching Across Borders override your interests, rights and freedoms.

Where processing is restricted, as well as storing your personal information, Coaching Across Borders will only process it during the period of restriction: (a) with your consent or if it is necessary (b) for the establishment, exercise or defence of legal claims; (c) for the protection of the rights of another person or (d) for reasons of public interest.

### 8.5 Right to Information portability

In some cases provided by applicable legislation, you are entitled to have the Personal Information you have provided to Coaching Across Borders: (a) sent to you in a structured, commonly used and machine-readable format; (b) sent directly by Coaching Across Borders to another data controller, provided that it is technically feasible.

In view of the processing actually carried out by Coaching Across Borders, this possibility only exists in this instance for the processing for which Coaching Across Borders asked for your consent or which is based on the performance of a contract entered into with you.

### 8.6 Right to withdraw consent

Where Coaching Across Borders is relying on your consent to process your Information, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of Coaching Across Borders' processing of your Information before withdrawal.

### 8.7 Right to object to processing

You have the right to object to processing of your Personal Information where Coaching Across Borders is relying on a legitimate interest or that of a third party and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. However, Coaching Across Borders may demonstrate having compelling legitimate grounds for the processing which override your interests, rights or freedoms.

You also have the right to object at any time to processing of your Personal Information where Coaching Across Borders is processing such Information for direct marketing purposes.

### 8.8 Right to lodge a claim

You are entitled, at any time, to lodge a claim with the relevant supervisory authority if you consider that your Personal Information has been processed in breach of the applicable data protection legislation.

Coaching Across Borders is committed to working with you to obtain a fair resolution of any complaint or concerns about your Personal Information. If, however, you believe that Coaching Across Borders has not been able to assist with your complaint or concern, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

## 9. LINKS TO THIRD PARTY WEBSITES.

This Policy does not address, and Coaching Across Borders is not responsible for, the privacy, information, or other practices of any third parties. On the Site, you may follow a link from or to other websites maintained by third parties. Hypertext links to third party websites or information do not constitute or imply an endorsement, incitation or recommendation by Coaching Across Borders of the third party, the third-party web site, or the information contained therein, unless expressly stated on the Site. Because these other websites are not hosted or controlled by Coaching Across Borders, this Policy does not address their privacy practices. Coaching Across Borders encourages you to review the privacy policies of these websites.

Coaching Across Borders is not responsible for the collection, usage, data security and disclosure policies and practices of other organizations, such as Facebook, LinkedIn, Apple, Google, Microsoft or any other app provider, app developer, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you provide to other organizations through or in connection with the applications and our social media pages.

## 10. POLICY UPDATES.

Coaching Across Borders reviews its privacy practices periodically. These privacy practices are subject to modifications. Coaching Across Borders encourages you to regularly review this Privacy Policy to ensure on-going familiarity with its most recent version. You may verify when this Policy was last modified by reviewing the "Date of last modification" at the bottom of the Policy pages. Any modifications to the Policy become effective when the revised Policy is posted on the Internet, accessible through the Site. Use of the Site after such modification constitutes your acceptance of the revised Policy then in effect.