

Privacy Notice for the GLION STUDENT LIFE WEBSITE

This is the Privacy Notice ("Notice") for <u>www.glionstudentlife.com</u> (the "Website") which is provided by is provided by GIHE Sàrl, a company incorporated under Swiss law with registered offices at Rue de l'Ondine 20, 1630 Bulle (we, us and our). The purpose of this Notice is to help you understand how and why we collect your personal data and what we do with it. It also explains the decisions that you can make about your personal data.

How do we use your personal data?

GIHE offers you the opportunity to research information via this Website, to receive our newsletter and/or to submit articles, offers and opinions.

Informational use of the website

When you visit our website for informational reasons, i.e. without registering for any of our services and without providing us with personal data in any other form, your browser may nonetheless transfer certain data to our web server. This is done for technical reasons and required to make available to you the requested information and to ensure system stability and efficiency and to implement proper safeguards as to the security of our website and services (Art. 6(1)(b) and Art. 6(1)(f) General Data Protection Regulation). Please see our cookies policy below for further information.

Subscription to Website

The subscription to the Website is offered on a voluntary basis and is mandatory to access the Website. You will be asked Sign up.

The data provided for this purpose (e-mail addres, first name, last name, glion e-mail address, phone number, attached photo, cv, cover letter, link to social media) will be used by us exclusively for the purpose of providing this service within the scope of your given consent (Art. 6(1)(a) General Data Protection Regulation).

GIHE uses the so-called "double opt-in" procedure for this purpose. In this procedure, an e-mail will be sent to the e-mail address provided by you with a request to confirm your consent. You can revoke your consent to be a member at any time free of charge with future effect by ??...

As soon as you unsubscribe from our newsletter, your personal data provided for our newsletter service will be deleted, unless other retention periods conflict with this.

Submission of Articles, Offers and Opinions

The opportunity for you to contribute to this Website through opinions, posts and other contributions (together "Your Content") is offered on a voluntary basis. The personal data provided for this purpose (first name, last name, glion e-mail address, phone number, attached photo, cv, cover letter, link to social media) will be used by us exclusively for the purpose of providing this service in accordance with our Terms of Use (Art. 6(1)(b) General Data Protection Regulation). We also remind you that you are responsible for any third-party personal data obtained, published or shared through this Website and confirm that you have the third party's consent to provide such data as the case may be.

Sharing information with others

For operational reasons and as is necessary and proportionate for intended purposes, we may share your information with other entities in the Sommet Education group and with trusted third parties or subcontractors who assist us in operating our Website, conducting our business, or servicing you (collectively, "External Parties"). We contractually require External Parties processing personal data on our behalf to follow this Notice, whether they are utilizing our and/or their own electronic systems and data management tools.

We may also release your information when we believe release is appropriate to comply with the law, enforce our policies, or protect our or others' rights, property, or safety.

This Website may contain advertising of third parties and links to other sites or frames of other sites where Sommet Education does not control how your data is processed. In those situations, please ensure you read and understand the privacy policies and practices of such websites and be aware that we are not responsible for the privacy practices or content of those third parties or other sites.

Sending information to other countries

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or Switzerland, for example where it is processed by staff operating outside the EEA/Switzerland who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA/Switzerland or who uses storage facilities outside the EEA/Switzerland. In these circumstances, your personal data will only be transferred on one of the following bases:

- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection;
- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission); or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

How do we secure your personal data?

We implement appropriate physical, administrative and technical measures designed to protect your personal data against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access or use, and all other unlawful forms of processing. We contractually require that External Parties provide equivalent levels of protection when handling your personal data and only process the data in

accordance with our instructions. In any cases, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate need for such access in accordance with this Notice.

For how long do we keep your personal data?

We strive to keep our processing activities with respect to your personal data as limited as possible. Your personal data will be retained only for as long as we need it to fulfil the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

What decisions can you make about your personal data?

You are able to make various decisions about your personal data. Your rights are as follows:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that:

- the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply;
- information request will be fulfilled free of charge unless in case of repetitive, manifestly unfounded or excessive requests or for further copies; and
- where our processing of your personal data relies on your consent and where you then withdraw that consent, it may affect the provision of the services.

Further information and guidance

We reserve the right to modify this Notice as needed, for example, to comply with changes in laws, regulations, our practices and procedures, or to respond to new threats or new requirements imposed by data protection authorities. Please just visit this page if you want to stay up to date, as we will post any change here.

If you have questions about your personal data, contact <u>media@sommet-education.com</u> or email our Data Protection Officer at <u>dpo@sommet-education.com</u>. The information you provide when contacting us will be processed to handle your request.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the relevant data protection authority.

Last update: February 2021

Cookies Policy

What are Cookies?

The main purpose of cookies is to make it quicker for users to access the services offered by the Website. In addition, cookies make it possible to tailor the services offered by the Website, allowing information of interest or potentially of interest to be provided to users depending on their use of the Website.

In practice, cookies are text files which are stored on your device. After you have finished your session and closed your browser many of the text files are deleted ("session cookies"). So-called "persistent cookies" may also be stored and these allow to recognize you during your next visit on our website.

We use cookies on this Website, in order to understand how you use our Website and to improve your experience.

What cookies do we use?

We differentiate between two categories of cookies:

- necessary cookies, which help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies, and
- optional cookies that include:
 - preference cookies: enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in;
 - statistic cookies: help us understand how visitors interact with the Websites by collecting and reporting information anonymously;
 - marketing cookies: used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

While the processing of necessary cookies is necessary to enable you to visit the Website and we do not need your permission (Art. 6(1)(b) General Data Protection Regulation), we only use optional cookies if we have obtained your prior consent (Art. 6(1)(a) General Data Protection Regulation).

Upon your first access to our Website, a banner will appear, asking you to give us your consent to the setting of optional cookies. If your consent is given, we will place a cookie on your computer and the banner will not appear again as long as the cookie is active. After expiration of the cookie's lifespan, or if

you actively delete the cookie, the banner will reappear upon your next visit to our Website and again ask for your consent.

Of course, you may also use our Website without any cookies being set (including necessary cookies). In your browser, you can at any time configure or completely deactivate the use of cookies. This may, however, lead to a restriction of the functions or have adverse effects on the user-friendliness of our Website.

Use of Necessary Cookies

We use Concrete5 web content management system to maintain a user session between pages.

Use of Optional cookies

On our Website we use Google Analytics, a web analysis service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States ("Google").

Google will analyze your use of our Website on our behalf. The information collected by Google in connection with your use of our Website (e.g. the referring URL, our webpages visited by you, your browser type, your language settings, your operating system, your screen resolution) will be transmitted to a server of Google in the US, where it will be stored and analyzed. The respective results will then be made available to us in anonymized form. Your usage data will not be connected to your full IP address during this process. We have activated on our Website the IP anonymizing function offered by Google, which will delete the last 8 digits (type IPv4) or the last 80 bits (type IPv6) of your IP address.

Further information on Google Analytics is available in the <u>Google Analytics Terms of Use</u>, the <u>Privacy and</u> <u>Data Protection Guidelines of Google Analytics</u> and in the <u>Google Privacy Policy</u>.

We also use separate Google products similar to Analytics. These are Tag Manager, which tracks actions on our site and Search Console, to analyze website performance.