

Data Protection and Cookies Charter

CENTRAL TEST

Central Test, an expert publisher that designs and distributes online psychometric assessment solutions, is a company committed to the protection of the privacy and personal data of users.

This is why we have taken the necessary measures to comply with the data protection laws of France and the data protection regulations of the European Union; the Regulation (EU) 2016/679 - the "General Data Protection Regulation".

1. Purpose

The purpose of this charter (hereinafter referred to as the "Charter") is to inform the users (hereinafter referred to as "the Users") of the different Sites and Platforms of Central Test (hereinafter referred to as the "Applications") of the means and commitments made by Central Test to collect and process personal data (hereinafter referred to as "Personal Data") in accordance with the laws in force and Regulation (EU) 2016/679 (hereinafter the "GDPR").

The term "User" means, in the case of this charter, any visitor to one of our websites, any client and partner beneficiary of our assessment services or any legal representative acting on behalf of the client, as well as any participant invited to take an assessment on the Central Test platform.

Similarly, when we use the terms "Central Test", "we" or "our", this includes all Central Test subsidiaries in France and around the world. The complete list of our subsidiaries can be found in the [Legal notices](#).

2. Who is in charge of the data collection?

Central Test SAS is in charge of collecting your personal data. The company is registered with the Registry of Trade and Companies of Paris under the number B 441 914 272, and the head office is located at 28, Boulevard de la Bastille, 75012 Paris, France.

As part of the use of Central Test services and the Platform for assessment purposes, the Client is also responsible for processing Personal Data provided by Participants. The processing of such data by the Client is subject to the same regulatory obligations and is governed by the Data Processing Agreement signed between Central Test and the Client.

3. What is the personal data that we collect?

Central Test collects only the necessary data needed to achieve the purposes of processing for the use of our services, as mentioned in the Article 4.

Thus, we namely collect and handle your name, surname, address, email address, telephone number, gender and/or civility, company, position, socio-professional category level of study, level of experience, sector of activity, payment information, connection data (date and hour of connection, IP address) and navigation data, order history, preference and interests, consulted products, comments, claims.

The collection of your personal data can be carried out in two ways:

- Directly, when you freely communicate your personal data to us;
- Automatically via the technology used on our Applications.

We collect your information when you :

- Browse our websites, look at products and use our services;
- Create or edit your client account or user account in the dedicated area on one of our websites;
- Place an order or sign up for a subscription on one of our websites;
- Take part in one of our games or contests;
- Contact our customer service;
- Download a white book, e-book or any other documentation related to one of our products;
- Request a product demonstration or a quotation;
- Attend an event, conference or webinar;
- Wish to be contacted by a salesperson.
- Are invited to take an assessment and benefit from an assessment report on one of our Applications;

When collecting data, the User is informed about the mandatory or optional nature of the data to be collected. Data identified with an asterisk on a form is required. Otherwise, the access to the Applications by the User is impossible.

Some information, including technical aspects (such as the IP address of your computer) or browsing of the website and its functionalities, are automatically collected via cookies. For more information, you can read our policy regarding cookies (article 8).

Customers are allowed to register minors over 13 years on the condition of obtaining prior permission from their parents or other persons exercising parental authority. Central Test reserves the right to terminate any personal account opened by a minor who could not justify this authorization.

4. For what purposes are your data collected?

The purposes of each processing of your personal data are described and defined at the time of collection of your data.

Central Test collects your personal data only to fulfill the following purposes:

- To manage your access to, and use of, our Applications;
- To carry out operations related to the management of our business relations: contracts, orders, subscriptions, bills, accounting, client account management, customer relationship monitoring, claims management, non-payments and litigations;
- To create a file of registered members, users, clients and leads in order to send personalised newsletters about our products and services and their evolution, through our news, invitations and promotional messages. The possibility to change or decline these invitations is explicitly stated when collecting data and during the processing of data.
- To improve our products and services by inviting you to take part in polls, studies, satisfaction surveys and product tests;
- To optimize your user experience of our website, including functionalities and services of the website;
- To analyze and conduct statistics related to the consultation and use of the website (number of pages viewed, number of visits and activity), of our services (articles read) and advertising displayed on the website, using Google Analytics;

- To exchange our clients and leads files with our subsidiaries and authorized partners;
- To process requests for access rights and the right to object, as well as fulfill our legal and regulatory obligations.
- To perform statistical analysis allowing continuous improvement of our tests (quality and reliability)

The Client as the Controller is the sole guarantor of collected Personal Data answering the following purpose: to perform any action relating to taking an assessment and using the results as part of an assessment process carried out on the Central Test Platform.

5. With whom are we likely to share your data?

Access to your personal data is strictly limited to Central Test and its subsidiaries, as well as authorized and legitimate third parties, for the processing of your data; only within the limits required for achieving the tasks they were given.

The authorized third parties can be:

- sub-processors, partners or service providers working for Central Test (including their employees)
- ministerial, judicial or administrative authorities, exclusively to meet legal obligations

Whenever we share Personal Data with such third parties, we strictly require that they process Personal Data provided by us only for the purposes mentioned and in accordance with our instructions, and that they always act in accordance with applicable laws regarding the protection of personal data.

International data transfers

Your data may be transferred to a country outside the European Union where legislation on data protection is not equivalent to that of the European Union.

We will perform these data transfers only to fulfill a contract between you and Central Test, perform a legal duty; protect the public interest or defend our legitimate interests.

Prior to any transfer of Personal Data outside the European Union, Central Test is implementing all necessary measures to ensure the security of such transfers.

When transferring your personal data outside the European Union, we take precautions in order to ensure that your data will remain properly protected. To this end, we submit all transfers of your data to appropriate and relevant safeguards (such as encryption and contractual commitments, including standard contractual clauses approved by the European Union - standard group agreements BCR).

By using this website, you consent to such transfer of information outside your country of residence.

Anonymous data sharing

If we have made your data anonymous, we may share it outside the Central Test group with partners such as research groups, academics, or related institutes solely for statistical purposes and validation of our assessment questionnaires .

These data will not allow us to identify you.

6. How do we ensure the security of your data?

We implement technical and organizational measures to protect your data, including encryption, anonymization, to prevent, as far as possible, any alteration or loss of your data or unauthorized access to it.

We require our staff and all third parties working for Central Test to maintain high standards of safety and protection of information, including contractual obligations under which they undertake the protection of all data and apply strict data transfer measures.

However, Central Test can not guarantee the elimination of any risk of misuse of Data. It is important that the user maintains the confidentiality of his password to prevent unauthorized use of his account.

7. What is the length of personal data retention?

Your personal data is stored for a period that doesn't exceed the duration necessary to the purposes for which it was collected.

7.1. Data related to prospect and clients management:

Your personal data will not be stored beyond the duration that is strictly necessary for the management of our business relationship with you, which has a three year time limit.

At the end of this three years, we would reconnect with you in order to find out whether you wish to continue receiving our commercial offers.

However, in the case of data that has to be retained under legal obligation, the duration of how long it is kept for will be determined according to the law.

7.2. Data related to bank cards:

We do not retain the data we receive from bank cards for any longer than the time needed for the completion of the transaction. However, this is not the case for clients who subscribe to our services. In that case, this data will be retained for the entire time of your subscription and at the very least until you complete your last transaction, in order to facilitate payment for regular clients.

By checking the box specifically intended for this on the website, you are giving us your consent for this retention.

Data related to the visual cryptogram or CVV2, marked on your bank card, is not stored.

In the case of payment by bank card, data related to the card could however be retained, for evidence purposes in case of a possible contesting of the transaction, as intermediary archive, for the duration planned by article L 133-24 of French Monetary and Financial Code (13 months following the date of debit). This time limit can be extended to 15 months in order to take into account the possibility of deferred payments when using debit cards.

7.3. The management of prospection opt-out lists:

Any information stored on a prospecting opt-out list will be retained for at least three years, from the date that you exercised your right to opt-out.

7.4. Audience measurement statistics:

Any information used to identify users or provide access to their traceability and/or attendance, will not be retained beyond six months.

7.5. Concerning the assessment process of Participants:

The Client agrees not to export, and retain Participants data beyond the purposes for which the data was collected.

At the end of the commitment period with the Client, as defined in the Contract, and in the event that the Client would not have extended these services, the results of past assessments are kept by Central Test for a period 12 months.

However, Central Test reserves the right to keep all or part of the data collected anonymously (without last name, first name, or Participant ID), particularly for statistical purposes.

8. Cookies policy

Cookies are small text files, encrypted, saved, and/or read by your browser, on the hard drive of your terminal (PC, laptop or smartphone for example) and left by websites that you visit.

Cookies are generally used to allow websites to function more efficiently, in order to enhance user experience when visiting the website, as well as to provide information to the website administrators. Two types of cookies can be identified, which don't have the same purposes : functional (or technical) cookies and advertising cookies :

Functional cookies are used throughout your navigation, in order to facilitate the execution of certain applications. A functional cookie can for example be used to memorise the answers filled out in a form, or user preferences regarding the language, or layout of a website, when such options are available.

Advertising cookies can be created not only by the website on which the user navigates, but also by other websites displaying advertisements, offers, widgets or other elements displayed on the page. These cookies can namely be used to do targeted advertising, that is advertising determined based on navigation of the user.

Use of cookies by Central Test

Central Test uses technical cookies to collect information during your visit on one of Central Test's websites. We use these cookies for different reasons, most frequently to differentiate you from other users on our websites and allow us to compile statistics regarding their use. We also use cookies to help us offer you a better experience when you visit our websites, and to help us enhance our content and personalise your visit.

Those cookies are stored on your browser for a period of 6 months.

We do not use advertising cookies. However, if we were to use them in the future, we would inform you beforehand and you would have the possibility to deactivate those cookies.

We use an audience analysis statistics tool which generates a cookies allowing measurement of the number of visits on the website, the number of pages viewed and the activity of users. The duration of retention of this cookie is limited to 6 months. Your IP address is also collected to determine the city from which you sign in.

We remind you, to all intents and purposes, that it is possible for you to oppose the placing of cookies by configuring your browser. Such a rejection could however prevent the proper functioning of the website.

9. What are your rights regarding your personal data ?

You are entitled to a right of access, rectification and erasure of your personal data, as well as a right of processing limitation and portability of your data. You are also entitled to the right to oppose the processing of your personal data on legitimate grounds and the right to oppose the processing of your data for prospecting purposes.

You can exercise those rights at any moment by contacting our customer service:

- By regular mail : Central Test, 28, Boulevard de la Bastille, 75012 Paris, France;
- By email : legal@centraltest.com

Note for Participants: The request for deletion of a Participant's personal data as part of an assessment must be sent directly to the Client who will delete the data concerned. If the Participant contacts Central Test directly, the latter will contact the Client in order to obtain their written consent for the deletion of the Participant Data.

11. What do we expect from you?

You must ensure that the information you have provided to us is relevant and up-to-date. You must also inform us, without delay, of any significant change in your situation. If you provide us with information about a third party, you must ensure that you are authorized to do so.

12. Modifications and agreement

Central Test reserves the right to modify this charter at any moment, entirely or partially. These modifications will come into effect starting from the publication of the new charter. By using the website and Central Test's Applications, you express your agreement to this Data Protection and Cookies Charter.

12. Entry into force

This policy has been updated, in its current version, on April 29th 2018.