

Privacy Policy

1 - General Information

1to1PROGRESS, concerned with the rights of individuals, particularly with regard to automated data processing, and in a desire for transparency with its clients, has put in place a policy covering all such processing, the purposes pursued by the latter as well as the means of action available to individuals so that they may best exercise their rights. We therefore invite you to read this document carefully to identify and understand the practices we implement regarding the processing of your personal data.

For any further information on the protection of personal data, we invite you to refer to the following site: <https://www.cnil.fr/>

The current online version of these terms of use is the only enforceable version for the duration of use of the site and this, until a new version replaces it.

2 - Legal Information

2.1 –Company

1to1PROGRESS, SAS with a capital of 207 093€, whose registered office is located at Horizon 2000, Mach 6, Avenue des Hauts Grigneux -76420 BIHOREL, FRANCE is represented by Laurent Zalc, in his capacity as Chairman, and registered with the RCS of Rouen under SIREN number: 529417248.

2.2 - Host

The 1to1PROGRESS.com site is hosted by Wixiweb, whose head office is located at 80, rue Michel Richard Delalande, 76000 ROUEN, FRANCE.

2.3 - Data Protection Officer (DPO):

A data protection officer, Lynne Cooper, lcooper@1to1progress.com, is available to answer any question relating to the protection of your personal data.

3 - Data collection

Your data are collected by 1to1PROGRESS.

Personal data refers to any information concerning an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number or to one or more elements specific to his physical, physiological, genetic, mental, economic, cultural or social identity.

The personal information that may be collected is primarily used by the publisher to manage relations with you and, where appropriate, to process your orders.

3.1 - Information that you communicate directly to us

By using our platform or our services, you may communicate information to us, some of which may be of a nature to identify you ("Personal Data"). This is particularly the case when you take part in one of our prize draws, contests, promotional offers, studies or surveys, when you contact us - whether by telephone, email or any other means of communication - or when you report an issue to us.

The personal data collected are the following:

- Your surname and first name
- Your email address

- Your telephone number
- The name of your company
- Your country of residence
- As part of the payment of products and services offered on the Platform, the latter records financial data relating to the user's credit card.
- Your answers to our surveys and questionnaires and the opinions you have left to evaluate a lesson, this information being in particular likely to be used within the framework of statistical analyses conducted on satisfaction;
- The data we may ask you to provide when you report a problem with our Platform or our services, such as the subject of your support request;

3.2 - Data we automatically collect

During each of your visits, we may collect, in accordance with the applicable legislation and with your consent, where applicable, information concerning the devices on which you use our services or the networks from which you access our services, such as in particular your IP addresses, connection data, types and versions of Internet browsers used, types and versions of browser plugins, systems and operating platforms, data concerning your browsing experience on our Platform, including your experience on the various URL pages of our Platform, the content you access or consult, the search terms used, download errors, the time taken to view certain pages, your device's advertising ID, interactions with the page and any telephone number used to contact us.

3.3 - Data retention policy

The Platform retains your data for the time necessary required to provide you with its services or to provide you with assistance.

To the extent reasonably necessary or required to meet legal or regulatory obligations, resolve disputes, prevent fraud and abuse or enforce our general terms and conditions, we may retain some of your information if necessary, even after you have closed your account or we no longer need to provide services to you.

4 - Use of data

Personal data collected from users is used to make the Platform's services available, improve them and maintain a secure environment. The legal basis of the processing is the execution of the contract between the user and the Platform. More specifically, the uses are as follows:

- Access and use of the Platform by the user;
- Management of the operation and optimization of the Platform;
- Implementation of user assistance;
- Verification, identification and authentication of data transmitted by the user;
- Management of potential disagreements with users;
- Organization of the terms of use of the Payment Services.

5 - Sharing your personal data

Personal data may be shared with third parties in the following cases:

- When the user utilizes the payment services, for the implementation of these services, the Platform is in relation with third party banking and financial companies with which it has concluded contracts;
- When the user publishes, in the free comment areas of the Platform, information accessible to the public;
- When the user authorizes the website of a third party to access his data;
- When the Platform uses the services of service providers to deliver user support, advertising and payment services. These providers have limited access to the user's data, in the context of the delivery of these services, and have a contractual obligation to use them in accordance with the provisions of the applicable regulations on the protection of data of personal nature;
- If and when required by law, the Platform may carry out the communication of data to deal with complaints against the Platform and comply with administrative and judicial procedures;

6 - Commercial offers

In accordance with the applicable law and with your consent where required, we may use the data you provide us with on our Platforms for marketing purposes (for example to send you our newsletters or any other communication likely to interest you).

Your data may be used by our partners, you can unsubscribe at any time.

If you access personal data when visiting the site, you must refrain from any collection, unauthorised use and any act that may constitute an invasion of the privacy or reputation of individuals. The publisher accepts no liability in this respect.

The data are kept and used for a period in accordance with the legislation in application.

7 - Transfer of your data

As a general rule, we store your Personal Data within the European Union. However, to the extent that, for example, some of our service providers are located in countries outside the European Union ("Third Countries"), we transfer some of your Personal Data to Third Countries. This may in particular be the case towards Third Countries for which the European Commission has not yet taken an "adequate protection" decision. However, all our service providers are selected according to their reliability and guarantees they offer.

In such a case, we ensure that this transfer is made in accordance with applicable regulations and guarantees an adequate level of protection of the privacy and fundamental rights of individuals.

8 - Your rights on your personal data

Pursuant to the regulations applicable to personal data, users have and may exercise the following rights:

- The right of access: they can exercise their right of access, to be made aware of the personal data concerning them, by writing to the following e-mail address: lcooper@1to1progress.com. In this case, before implementing this right, the Platform may request proof of the user's identity in order to verify its accuracy.
- The right of rectification: if the personal data held by the Platform are inaccurate, the users may request that the information be updated.
- The right to delete data: users may request the deletion of their personal data, in accordance with applicable data protection laws.
- The right to limit processing: users may ask the Platform to limit the processing of personal data in accordance with the assumptions set out in the GDPR.

- The right to object to the processing of data: users may object to their data being processed in accordance with the assumptions laid down in the GDPR.
- The right to portability: they can claim that the Platform gives them the personal data that provided it to transmit them to a new Platform.

Users can exercise these rights by contacting us at the following address: 1to1 Consulting - Horizon 2000, Mach 6 - Avenue des Hauts Grigneux - 76 420 BIHOREL, FRANCE

Users can also contact our Data Protection Officer.

All applications for the exercise of these rights must be accompanied by a photocopy of a valid, signed identity document and mention the address at which the publisher may contact the applicant. A reply will be sent within one month of receipt of the request. This one-month period may be extended by two months if the complexity of the application and/or the number of applications so require. Further, and in accordance to the law n°2016-1321 of October 7, 2016, the individuals who wish it, have the possibility of organising the fate of their data after their death. For more information on the subject, you can consult the CNIL website: <https://www.cnil.fr/>.

Users can also lodge a complaint with the CNIL on the CNIL website: <https://www.cnil.fr/>.

We recommend that you first contact us through the Platform before filing a complaint with the CNIL, as we are at your available at any time to resolve any form of issue amicably and in a timely manner.

9 - Cookies and similar technologies

A "Cookie" or tracer is an electronic file placed on a terminal (computer, tablet, smartphone,...) and read for example when consulting a website, an e-mail, installing or using software or a mobile application, whatever the type of terminal used (source: <https://www.cnil.fr/fr/cookies-traceurs-que-dit-la-loi>).

When browsing this site, "cookies" from the company responsible for the site concerned and/or from third companies may be placed on your terminal.

All information collected will only be used to track the volume, type and configuration of traffic using this site, to develop the design and layout and for other administrative and development purposes and more generally to improve the service we provide to you.

The following cookies are present on the site <https://1to1progress.com>

1) List of cookies generated by the 1to1progress.com domain

Required for multilingual:

- `_icl_current_language` - Stores the current language
- `_icl_current_admin_language_{hash}` - Stores the current WordPress administration area language.
- `_icl_visitor_lang_js` - Stores the redirected language.
- `wpml_browser_redirect_test` - Tests if cookies are enabled.
- `wpml_referer_url` - Stores the last requested URL on the front-end.
- `wpml_admin_referer_url` - Stores the last requested URL on the back-end.
- See with WPML: <https://wpml.org/documentation/support/browser-cookies-stored-wpml/>

Required for the chat (to maintain the window from one page to the other)

- `__zlcmid` - store visitor's ID for widget's authentication (365 days)
- `__zlcprivacy` : store visitor's decision on CookieLaw Javascript API (365 days)

- See with Zendesk : <https://chat.zendesk.com/hc/en-us/articles/360001352868-Browser-cookies-from-Chat-widget-Web-SDK>

Optional Google Analytics tracer. See with Google: <https://support.google.com/analytics/answer/6004245>

- `_ga` - Used to distinguish users. (2 years)
- `_gat` - Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named `_dc_gtm_<property-id>`. (1 minute)
- `_gid` - Used to distinguish users. (24 hours)
- See with Google: <https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

2) List of cookies generated by the google.com domain

Required for reCaptcha :

- `1P_JAR`, `APISID`, `DV`, `HSID`, `SAPISID`, `SID`, `SSID`, `NID`, `OGP`, `OGPC`, `OTZ`, `SIDCC`, `UULE`, `_ga`

These cookies, provided by Google Inc., are used in conjunction with the Google reCAPTCHA service for account creation and login authentication. <http://www.google.com/intl/en/policies/privacy>

The following cookies are present on the platform <https://app.1to1progress.com>:

- `ONETOONESSID`: connexion Identification to the platform (24 hours)
- `SpryMedia_DataTables_*`: retains data table sorting preferences
- Facultatif, traceur Google Analytics

See with Google: <https://support.google.com/analytics/answer/6004245>

- `_ga` - Used to distinguish users. (2 years)
- `_gat` - Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named `_dc_gtm_<property-id>`. (1 minute)
- `_gid` - Used to distinguish users. (24 hours)
- See with Google: <https://developers.google.com/analytics/devguides/collection/gtagjs/cookie-usage>

For further information on the use, management and deletion of "cookies" for any type of browser, you may consult the following link: <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

10 - Confidentiality of your password

You are responsible for the confidentiality of the password we issued for you following the creation of your account.

You agree to keep this password secret and not to share it with anyone.

11 - Links to other websites and social networks

Our Platforms may occasionally reference links to the websites of our partners or third party companies. Please note that these websites have their individual privacy policies and we are not responsible for the use made by these websites of the information collected when you click on these links. We invite you to read the privacy policies of these sites before communicating your Personal Data to them.

12 - Changes to our Privacy Policy

We may change this Privacy Policy periodically. When indispensable, we will inform you and/or seek your renewed consent. We recommend that you visit this page regularly to review any changes or updates to our privacy policy.

13 - Applicable law

The present conditions of use of the site are overseen by French law and subject to the jurisdiction of the courts of the registered office of the publisher, subject to a specific attribution of jurisdiction deriving from a specific legal or regulatory text.

14 – Contact

Should you have any questions about this privacy policy or if you have any questions concerning your personal data, you can contact us at:

- Send an e-mail to our Data Protection Officer at the following address : lcooper@1to1progress.com
- Or by written correspondence at the following address: 1to1 Consulting - Horizon 2000, Mach 6 - Avenue des Hauts Grigneux - 76 420 BIHOREL, FRANCE

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