



GDPR Compliance

Get the full story on GDPR, data protection, and hosting



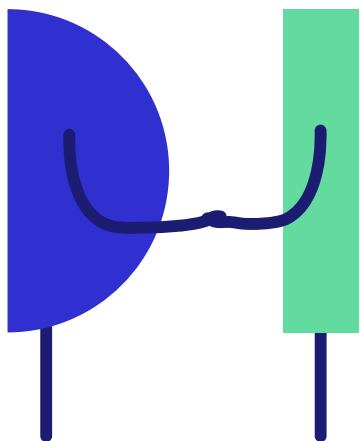
Dear partners and project leaders,

As you're likely aware, the General Data Protection Regulation (GDPR) became the new European standard for personal data protection starting May 25, 2018. This updated regulation applies to any company holding data on European citizens. To provide full transparency into our data confidentiality practices, please allow us to highlight some important points.

Our approach to meeting GDPR requirements

Data security and personal information confidentiality have always been top priorities for Édifice. From the very start, our solutions were designed to comply with the French National Education system, which establishes a trusted functional, technical, and legal framework. They also adhered to the CNIL's unified regulatory act RU-0003, derived from the order of November 30, 2006, as amended by the October 13, 2017 order governing personal data processing. With the introduction of GDPR, where we act as a data processor, aligning our practices was a natural progression.

Within a VLE, who is in charge of data processing?

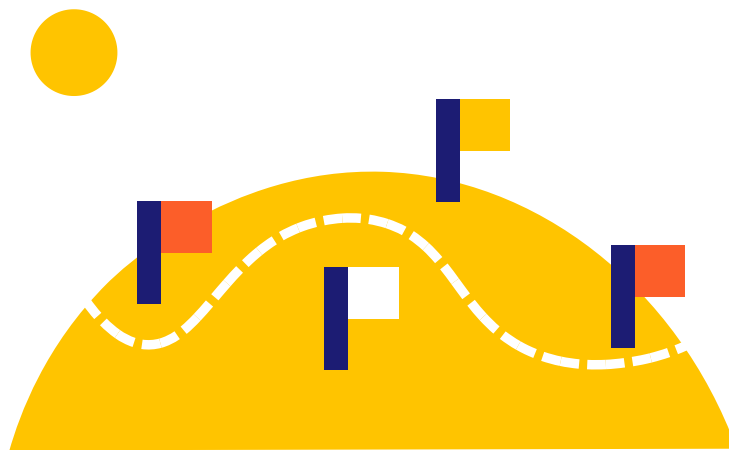


The CNIL's regulatory act RU-0003 clearly outlines the responsible parties:

- For schools, it is the Academic Director of National Education Services,
- For secondary schools, vocational training centers, and private institutions under contract, the responsibility falls on the Head of the Institution,
- At the higher education level, the President of the Institution assumes this role.

As the solution provider and data host, we also bear certain responsibilities and commitments:

- The personal data within our solutions is limited to the information entered during account creation or provided by users in their profiles.
- Édifice hosts this personal data, but does not utilize it for any other purposes.
- We never sell or rent out personal data. Data collection and processing strictly adheres to legal provisions, especially GDPR.
- All data is automatically and permanently deleted 90 days after an account closure.
- Data is hosted in a secure OVH Data Center located in Roubaix, France (with 24/7 security monitoring and full compliance with data security standards/certifications).

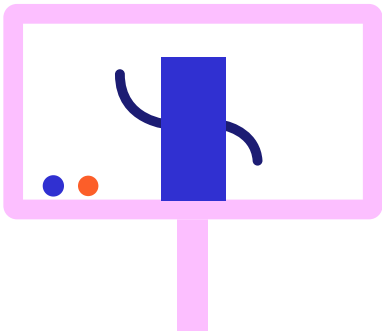


Édifice has transformed its organization to ensure daily GDPR compliance.

To guarantee long-term adherence to GDPR standards, we've implemented several key organizational changes:

- We appointed a dedicated Data Protection Officer (DPO), as defined under GDPR. David Breyton now oversees our processing register, cataloging all personal data handling by our solutions and verifying GDPR conformity.
- Every Édifice team member undergoes specialized training on proper data handling protocols and understanding the sensitive nature of the tasks they perform.
- Our support staff is fully prepared to handle inquiries related to data management practices.

An important organizational consideration



Should a user contact us with questions about their personal data (accessing it, the right to be forgotten, making modifications, etc.), we can certainly provide clarity and identify the party responsible for the data or its processing. However, to streamline the handling of such requests and facilitate communication, it would be best if a single point of contact is designated at the project level. Please share the name and contact information for this designated individual with us.

Sincerely,

The Édifice Team