

Privacy Policy

1 Introduction

1.1 EARTHLY SUPPLY COMPANY – a.k.a. ‘EYS’ is committed to respecting and protecting your privacy. This Privacy Policy (the “Policy”) explains how we will collect, store and use any personal data you provide via our website, phone, email or networking with our people and when you otherwise communicate with us (including in the course of the services we provide or the running of our business).

1.2 Our details are as follows:

EARTHLY SUPPLY COMPANY

Port Gallice de Juan les Pins
Bâtiment Nord-Local 3
47 Boulevard Edouard Baudoïn
06160 Antibes
SIRET: 4929178930004

1.3 This Policy may change from time to time and, if it does, the up-to-date version will always be available on our website and becomes effective immediately.

1.4 Please take the time to read this Policy, which contains important information about the way in which we process personal data.

1.5 For the purposes of this Policy, “European Data Protection Legislation” is defined as any European or French laws that applies to data collection and protection.

Information we may collect about you:

- We may collect and process information about you and your personnel in the course of carrying out work for you (or your business) and/or through a referral from one of our partners, through various means, including:
 - via our website (e.g. on our articles pages or ‘Contact Us’ page or our news pages, etc.),
 - by email or other electronic correspondence,
 - by telephone,
 - networking (e.g. at trade fairs, client events and/or other meetings or events either hosted or attended by us),
 - by operating security policies and procedures in our offices,
 - otherwise through providing our services or operating our business.

The personal data collected may include:

- your name and title,
- contact information, including telephone number, postal address and email address,
- information relating to your location, preferences and/or interests,
- employment and job application details, e.g. date of birth, employment history, qualifications, equality monitoring information,
- photographic identification,
- your and others signature(s), Social Security number(s), identity documents, financial details such as bank account details,
- data relating to health (including disabilities), and other ‘special category personal data’
- the content of any enquiry submitted over our website,
- any other personal data we collect (such as the client reference number which may be assigned to you) in the context of our work for our clients or in the course of operating our business.

2.3 Each time you visit our website, we may also automatically collect the following information:

- web usage information (e.g. IP address), your login information, browser type and version, time zone setting, operating system and platform,
- information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our website (including date and time); time on page, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs),
- location, device and demographic information (Google Analytics provides age range and gender information).

2.4 We may ask you for information when you report a problem with our website.

2.5 If you contact us, we may keep a record of that correspondence.

2.6 The personal data described above may relate to any of the following categories of person:

- our clients and clients' employees,
- our prospective employees, work experience students or other job applicants,
- those emergency contacts whose details have been provided to us by our people,
- third parties with whom we have contact by virtue of providing our services (e.g. third-party payers of invoices and counterparties on a client's matter),
- our contacts at our 'Preferred Firms' or referrers, professional advisors or others with whom we work in the context of our services,
- our prospective target clients,
- our contractors and suppliers,
- those who submit enquiries through our website or whose details are otherwise entered into our client relationship management system,
- any other visitor to our offices.

Cookie Policy

Our website uses cookies to distinguish you from other users, to improve your experience on our website and to recommend content that may be of interest to you. For full details on how we use cookies, please see our [Cookie Policy](#).

How we will use your information

We may use your information for the following purposes:

- to respond to any query that you may submit to us,
- to manage our relationship with you (and/or your business), including by maintaining our database of clients and other third parties for administration, and accounting and relationship management purposes,
- to complete our contractual obligations to you, or otherwise taking steps as described in our engagement terms and/or our Terms of Business (including any associated administration),
- to send you any relevant information on our services and events that may be of interest to you using the email and/or postal address which you have provided, but only if you have given us your consent to do so or we are otherwise able to do so in accordance with applicable European Data Protection Legislation,
- to process any job application you, (or your representative), has submitted,
- to ensure that our website's content is presented in the most effective manner for you and your device,
- to customise our website according to your interests,

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey responses,
- to allow you to participate in interactive features on our website when you choose to do so,
- as part of our efforts to keep our website safe and secure,
- to measure or understand the effectiveness of advertising we send to you and others, and to deliver relevant advertising to you,
- to ensure we appropriately administer any attendance / visits to our offices,
- to comply with any other professional, legal and regulatory obligations which apply to us or policies that we have in place,
- as we feel is necessary to prevent illegal activity or to protect our interests.

Legal grounds for processing your information

We rely on the following legal bases for processing your personal data:

- performance of, or entry into, a contract,
- compliance with a legal obligation to which we are subject,
- legitimate interest as a services provider, including our interests in managing our relationship with our clients, administering visits to our offices and ascertaining achievement of proper standards/ compliance with policies, practices or procedures.
- in the context of the establishment, exercise or defence of legal claims.

Sharing your information

We may share your details with carefully selected third parties. These may include service providers, support services and organisations that help us to market our services and third parties instructed to enable us to fulfil our contractual obligations to you and/or our clients in the course of business.

If we share your information with third parties, they will process your information as either a data controller or as our data processor and this will depend on the purposes of our sharing your personal data. We will only share your personal data in compliance with the European Data Protection Legislation.

We may disclose your information to third parties when:

- you specifically request this, or it is necessary to provide our services to you (e.g. when we need to communicate with the 3rd party providers to provide you with the service we have contracted to do so),
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets,
- if our website or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets,
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property or safety of our website, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The third parties include:

- our bank (including as permitted by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 which, for the purposes of preventing money laundering or terrorist financing, may require us to disclose your personal data on request to our bank from time to time where we hold monies in our pooled Client Account on your behalf),
- our insurers,
- our auditors, including external accreditation bodies,
- other professional advisors or third parties (including compliance consultants, counsel, overseas lawyers, accountants, expert witnesses or costs draftsmen) with whom we engage as part of our work for our clients or who our clients separately engage in the same context,

- our data processors providing security, email security, data governance, archiving and other IT and business support services,
- our email marketing platform provider and our website platform provider,
- selected partner digital agencies and online job application provider,
- analytics and search engine providers that assist us in the improvement and optimisation of our website,
- any third party you ask us to share your data with.

6.5 Our website may, from time to time, contain links to and from the websites of partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

6.6 We will not rent or sell our users' or other contacts' details to any other organisation or individual.

Storage and retention of your personal data

7.1 We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information you register on our website will be located behind a firewall. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot absolutely guarantee the security of your data.

7.2 We will keep your information stored on our systems for a duration of a least 5 years from the last contact. We may keep your data for longer than our stated retention period if we cannot delete it for legal, regulatory or technical reasons.

7.3 Any contact details stored on our client relationship management database will be removed from our mailing lists if they do not interact with our emails (i.e. open emails or click on links within them) for a certain period following which they will be moved to an archive folder before being deleted permanently.

7.4 The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you.

7.5 We will, subject to paragraph 7.2, not store your information for longer than is reasonably necessary or required by law.

Sending your information outside of the EEA

8.1 If we need to share your personal data with a recipient outside the European Economic Area ("EEA") (e.g. a professional advisor or third party engaged by us or you as part of our work under an engagement letter), we will ensure we do so in compliance with European Data Protection Legislation, including where applicable by ensuring that the transfer is necessary to perform a contract in place with you or a contract entered into in your interests.

8.2 Our people may access our systems remotely when working abroad (including from jurisdictions outside the European Economic Area). Where they do so, they are required to use our systems and access any personal data in accordance with all the usual policies and procedures.

Withdrawal of consent

9.1 Where we process your personal data, we do so on the basis that you have provided your consent for us to do so for the purposes set out in this Policy when you submitted your personal data to us. You may withdraw your consent to this processing at any time by contacting us at team@eys-training.com.

9.2 If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds and will notify you of these at such time.

10 Your information rights

10.1 European Data Protection Legislation gives you the right to access information held about you. You are entitled to be told by us whether we or someone else on our behalf is processing your personal information; what personal information we hold; details of the purposes for the processing of your personal information; and details of any third party with whom your personal information has been shared.

10.2 You can access the personal information we hold on you by writing to us at:

EARTHLY SUPPLY COMPANY

Port Gallice de Juan les Pins, Bâtiment Nord-Local 3, 47 Boulevard Edouard Baudoin, 06160 Antibes

You can also contact us by email at team@eys-training.com.

10.3 We will ask you to provide proof of identity before we show you your personal information – this is so we can prevent unauthorised access.

10.4 You have the additional rights to request rectification and erasure of your personal data and to request restriction of, and to otherwise object to, our processing of your personal data and you can exercise these rights at any time by contacting team@eys-training.com.

10.5 You are also entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise this right from 25 May 2023 by contacting us at team@eys-training.com.

11 Complaints

11.1 If you consent to us contacting you, we will always aim to be respectful, relevant and appropriate. If at any time you do not think that we have complied with this, please contact us straight away to let us know.

11.2 You also have the right to make a complaint to team@eys-training.com.

11.3 If you consider that after having contacted us, your rights are not respected, you may file a claim with the CNIL (www.cnil.fr).

12 Contact

Questions, comments and requests regarding this Policy should be addressed:

EARTHLY SUPPLY COMPANY

Port Gallice de Juan les Pins, Bâtiment Nord-Local 3, 47 Boulevard Edouard Baudoin, 06160 Antibes

Email address: team@eys-training.com

Telephone number: +33 (0)4 89 02 43 40