

PERSONAL DATA PROTECTION POLICY

PREAMBLE

MIMBUS, whose head office is located at 1 Rond-Point de Flotis 31240 Saint-Jean, registered in the Toulouse Trade and Companies Register under number 531 522 225, offers virtual solutions dedicated to professional training.

To this end, MIMBUS provides training centres with the Vulcan system which, thanks to connected virtual simulators, allows the performance of learners to be monitored in real time and their progress to be analysed over time.

When registering on the Vulcan platform, a role is assigned to the User giving him/her access to various functionalities.

The User can be :

- A Learner User ;
- A Trainer User; or
- A Manager User.

As the controller, MIMBUS takes the protection of the User's privacy seriously and is committed to protecting his or her personal data.

Therefore, the Vulcan technology has been developed by MIMBUS with the User's privacy in mind from the very beginning, including the principle of minimizing the data collected.

Therefore, the purpose of this Policy is to provide the User with fair and transparent information on how and why MIMBUS collects and processes personal data.

MIMBUS complies with the legal and regulatory requirements in force, namely the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR") and the amended Data Protection Act of 6 January 1978.

ARTICLE 1: TYPE OF PERSONAL DATA COLLECTED

When creating an account, MIMBUS collects identifying data about the User, including:

- Last name ;
- The first name ;
- Date of birth ;
- Gender ;
- E-mail address;
- Language spoken ;
- Laterality ; and
- A profile picture, if the User wishes to provide one.

Furthermore, when the Learner User uses a virtual simulator connected to the Vulcan platform, MIMBUS collects and processes data related to his physical movements, in particular data corresponding to body movements or micromovements.

ARTICLE 2 – PURPOSE OF THE PROCESSING OF PERSONAL DATA

2.1. Legal basis for processing personal data

When the user account is created, the User is asked to give free, specific, informed and unambiguous consent to the collection and processing of his/her personal data.

On the same occasion, MIMBUS asks the Learner User to explicitly consent to the collection and processing of data related to his/her movements and physical movements for the specific purposes set out in article 2.2. by inviting him/her to tick a specific box provided for this purpose.

The User understands that by refusing to give consent for the collection and processing of his/her movement data, he/she is giving up the right to use the services provided by the Vulcan platform.

If the Learner User is a minor under the age of fifteen (15), the consent will have to be given jointly with the holder of parental authority.

MIMBUS will keep a record of the User's consent to the collection and processing of his/her personal data.

2.2. Purpose of the processing of personal data

MIMBUS collects and processes the User's personal data for a specific and legitimate purpose. Such personal data shall not be further processed in a manner incompatible with this initial purpose.

MIMBUS uses the collected information in order to provide and ensure the use of the products by the user in accordance with the expectations of using the Vulcan system.

Accordingly, MIMBUS uses the User's personal data for :

- For the User to access and use the Vulcan Platform ;
- To provide the services and features of the Vulcan Platform to the User ;
- To manage the operation and optimization of the Vulcan Platform ;
- Promote communication between the User Trainer and the User Learner in the course of training ;
- Implement User support ; and
- Manage possible disputes.

In particular, with regard to data related to the User's movements, MIMBUS uses this data to accomplish the following specific purposes:

- To assess the manual skills of the User Learner; and
- Evaluate the progress of the Learner User;
- To track and monitor the activity of the Learner User; and
- To provide a comprehensive analysis and statistics of the activities of Learning Users on the same course.

Finally, MIMBUS may process the User's personal data, after anonymization, for the purpose of enriching its database for the automatic learning of the Vulcan system and for statistical studies. In these cases, and due to the anonymization process implemented by MIMBUS, the User understands that this processing has no impact on his/her privacy and that MIMBUS is therefore not subject to the requirements of the GDPR.

ARTICLE 3 - SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

MIMBUS attaches the utmost importance to the security and integrity of its users' personal data.

MIMBUS undertakes to protect the personal data collected, not to transmit them to third parties without the User's prior knowledge and to respect the purposes for which these data were collected.

Consequently, MIMBUS undertakes to take all technical, organisational and software measures in terms of digital security to protect the User's personal data against alteration, accidental or unlawful destruction, accidental or unlawful loss and unauthorised distribution or access, as well as against any other form of unlawful processing or communication to unauthorised persons.

In the case of data used for the automatic learning of the Vulcan system or for statistical studies, MIMBUS implements measures to anonymize the personal data, thus irreversibly preventing any re-identification of the user. In this respect, MIMBUS guarantees the User that this process of anonymisation prevents the individualisation of the User, the linking of separate data sets concerning the User and the almost certain deduction of new information on the User.

In the event that the integrity, confidentiality or security of the User's personal data is compromised and is likely to result in a high risk to his rights and freedoms, MIMBUS undertakes to inform the User by any means and as soon as possible.

ARTICLE 4 - ACCESS TO PERSONAL DATA

The administrative staff of MIMBUS is authorised to process the User's personal data by virtue of their duties.

ARTICLE 5 - SHARING USER INFORMATION WITH THIRD PARTIES

User information may be shared with others in the following ways.

5.1. Visibility of User information when using the Vulcan platform

When using the VULCAN system, an unidentified User who does not have the required access as a Manager User, Trainer User or Learner User may not access the data of another User.

While the Learner User has access to the results related to his/her experience on the virtual simulator as well as to the results of his/her class, he/she cannot consult the scores of other Learner Users.

The Trainer User has access to the results of the Learner Users belonging to the classes assigned to him.

Finally, the User Manager, who has the authority to manage user accounts and access rights, has access to the profiles of the Learner Users and the Trainer Users.

5.2. Sharing of personal data on social networks by the User*

The User has the possibility to publish information about his/her performance and scores on social networks such as, for example, Facebook or LinkedIn.

The User must bear in mind that his or her posts on social network accounts will be made public.

Therefore, the User understands that by publishing content on social networks, he/she is solely responsible for it.

Consequently, MIMBUS is not responsible for the content that the User has posted on the Internet via social networks.

5.3. Sharing personal data with processors

MIMBUS uses the services of subcontractors with cloud infrastructures to store the User's personal data.

In order to safeguard the security of the User's personal data and the protection of the User's rights, MIMBUS has ensured that its subcontractors use the User's personal data only in accordance with its instructions and provide sufficient guarantees as to the implementation of technical, organisational and software measures providing a high level of security for its services.

5.4. Sharing of personal data with the subsidiary of the MIMBUS group

MIMBUS may pass on the User's personal data to its subsidiary company, MIMBUS Inc.

In order to safeguard the security of the User's personal data and the protection of the User's rights, MIMBUS has ensured that MIMBUS Inc. uses the User's personal data

only in accordance with its instructions and provides sufficient guarantees that it has implemented technical, organisational and software measures that provide a high level of security for its services.

ARTICLE 6 – PLACE OF COLLECTION AND PROCESSING OF PERSONAL DATA

MIMBUS collects and processes personal data which are hosted on servers located in non-EU countries, but which may also be communicated to the US subsidiary of the MIMBUS group.

As a result, MIMBUS transfers personal data outside the European Union.

While laws and regulations vary from one country to another, some offering the User more protection than others, MIMBUS ensures that it shares personal data with companies that guarantee a level of protection adequate to the RGPD.

To this end, MIMBUS and these companies use and respect a legal framework for the transfer of data known as the standard contractual clauses (SCC).

TCAs are written commitments between the parties that serve as a basis for data transfers from the European Union to third countries and that provide for appropriate safeguards for the protection of personal data.

The TCAs are defined and approved by the European Commission and cannot be modified by the parties using them. The User can consult this document by clicking [here](#).

ARTICLE 7 – DURATION OF STORAGE OF PERSONAL DATA

MIMBUS will keep all personal data of the User for as long as the User has an active account on the Vulcan platform.

In principle, the User's personal data will be stored for a period not exceeding three (3) years after the last login on the Vulcan platform.

MIMBUS may store this data anonymously for the purpose of enriching its database for the automatic learning of the Vulcan system or to retain its statistical value. In this context, and due to the anonymization process implemented by MIMBUS, the User understands that the retention of his/her personal data has no impact on his/her privacy and that MIMBUS is therefore not subject to the requirements of the GDPR.

Data related to the User's travel and physical movements will not be retained after the User's account is closed.

In any case, the User has the possibility to exercise his right to erase his data in accordance with the provisions of article 8 of this Policy.

When closing his account, the User may also exercise his right to portability and ask MIMBUS to recover all his information in accordance with the provisions of Article 8 of this Policy.

ARTICLE 8 – EXERCISE OF USER'S RIGHTS

8.1. Presentation of the User's rights

In accordance with the applicable regulations on the protection of personal data, the User has the following rights:

- The User may exercise his/her right of access to know his/her personal data;
- The User may exercise his/her right of rectification so that MIMBUS may correct any personal data that is inaccurate or incomplete;
- The user may exercise their right to erase their personal data if they wish to delete their account on the VULCAN platform;
- The User may exercise his/her right to the portability of his/her personal data and ask MIMBUS to obtain all his/her personal data in a structured, commonly used and machine-readable format;
- The User may exercise his/her right to limit the processing of his/her personal data, in particular during the time necessary for MIMBUS to verify that the User is validly exercising his/her right to erasure;
- The User may exercise his right to object to the processing of his personal data. In this case, MIMBUS shall cease to process the User's personal data. The User understands that by objecting to the processing of his/her personal data, he/she gives up the right to use all or part of the services offered on the Vulcan platform;
- The User may exercise his/her right to withdraw consent to his/her personal data as easily as he/she gave it and at any time. In this case, MIMBUS will cease processing the User's personal data. The User understands that by withdrawing

his consent to the processing of his personal data, he is giving up the use of all or part of the services offered on the Vulcan platform.

8.2. Procedure for exercising rights

The User may exercise the aforementioned rights by contacting MIMBUS by e-mail at the following address: support@mimbus.com.

In support of his/her request, the User must provide MIMBUS with a copy of his/her valid proof of identity.

MIMBUS is obliged to respond to the User's request within a maximum of 30 (thirty) days from receipt of the request.

However, MIMBUS shall have a period of two additional months due to the number or complexity of the requests. If necessary, MIMBUS will inform the User of the extension of the deadline and the reason for it.

MIMBUS is not obliged to accept the User's request if it is manifestly abusive, in particular because of its repetitive nature, or if there are compelling and legitimate reasons that prevent its satisfaction.

In any event, MIMBUS will inform the user of the action taken on his request.

In the event that MIMBUS does not respond to the request within the time limit set, the User has the right to refer the matter to the Commission Nationale de l'Informatique et des Libertés (CNIL) if he/she wishes to contest a decision or if he/she believes that one of the rights listed above has been infringed.

Contact details:

CNIL

3 place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07

Telephone : 01.53.73.22.22.

URL : <https://www.cnil.fr>

ARTICLE 9. MODIFICATION OF THE DATA PROTECTION POLICY

MIMBUS reserves the right to modify this Policy at any time to ensure its compliance with applicable law.

In the event of significant changes, MIMBUS will inform the User through the Vulcan Platform or by other means such as sending emails.

MIMBUS encourages the User to periodically review this Policy for the latest information on our privacy practices.