



SAS COACHING DEVELOPPEMENT

Application « OPTITRAINER »

Data Protection Charter

Version du 06/06/2026

1. Preamble

This charter – "the Charter" – has been drawn up to define the commitments for data protection and to specify the implementation of the General Data Protection Regulation – "GDPR" – within the company COACHING DEVELOPPEMENT for the OPTITRAINER brand.

COACHING DEVELOPPEMENT attaches particular importance to the protection of the personal data of its employees, clients, partners, and users of its website and applications.

COACHING DEVELOPPEMENT informs data subjects of the methods used to collect personal data, how it is used, and the options available to them. This Charter may be amended by COACHING DEVELOPPEMENT in the event of regulatory, judicial, or technical developments.

COACHING DEVELOPPEMENT complies with the "Data Protection Act" No. 78-17 of 6 January 1978, as amended, as well as the "Act for Confidence in the Digital Economy" No. 2004-575 of 21 June 2004, and the General Data Protection Regulation No. 2016/679 of 27 April 2016.

The General Data Protection Regulation No. 2016/679 of 27 April 2016 has been applicable across the European Union since 25 May 2018.

2. Definitions

Personal Data: personal data means any information relating to an identified or identifiable natural person, directly or indirectly, by reference to an identification number or to one or more factors specific to that person.

Processing of Personal Data: processing of personal data means any operation or set of operations carried out on such data, regardless of the method used, including collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, alignment or combination, as well as blocking, erasure or destruction.

Cookies: a cookie is a piece of information placed on the hard drive of an internet user by the server of the site they visit. It contains several items of data: the name of the server that placed it, a unique identifier, and possibly an expiry date. This information is sometimes stored on the computer in a simple text file that a server reads and writes to.



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3. Collection of Personal Data

COACHING DEVELOPPEMENT undertakes not to collect personal data without first informing the data subjects concerned.

COACHING DEVELOPPEMENT collects data to provide the services and/or products requested by data subjects, respond to their needs, and informs them of how it is used.

COACHING DEVELOPPEMENT ensures the relevance of the personal data collected in order to better understand the data subjects concerned.

COACHING DEVELOPPEMENT automatically collects information submitted by data subjects relating to the use of the website itself. This information may include unique device identifiers, internet protocol ("IP") addresses, browser characteristics, language preferences, operating system details, referring URLs, as well as the duration of visits to the website and pages viewed.

COACHING DEVELOPPEMENT may use tools such as cookies, web beacons, embedded scripts, web server logs, or other similar technologies to collect details about the services and devices used to access the OPTITRAINER website and mobile application.

4. Use of Collected Personal Data

COACHING DEVELOPPEMENT ensures the confidentiality of personal data entrusted to it and, from the design stage of services, websites, and applications, upholds data protection principles.

COACHING DEVELOPPEMENT uses the personal data of data subjects to authenticate them, provide the subscribed service and/or product, and offer them solutions tailored to their needs.

COACHING DEVELOPPEMENT only discloses personal data to its authorised service providers or subcontractors and ensures they comply with strict conditions of confidentiality, use, and data protection.

COACHING DEVELOPPEMENT undertakes not to share personal data with third parties without first informing the data subjects and offering them the opportunity to exercise their right to object.

COACHING DEVELOPPEMENT may use data belonging to data subjects that has been irreversibly anonymised for statistical research purposes.

5. Purpose of Processing

When a user visits the OPTITRAINER website or uses the OPTITRAINER application, they may provide COACHING DEVELOPPEMENT with certain personal data in order to benefit from the services and/or products offered by the OPTITRAINER brand.

The processing of personal data is necessary for the performance of services or for the legitimate interests of COACHING DEVELOPPEMENT in the execution of its services. The collection of personal

data enables COACHING DEVELOPPEMENT to provide data subjects with the best possible monitoring of the services/products sold under the OPTITRAINER brand, and to improve the functioning of the website or applications used. It also enables COACHING DEVELOPPEMENT to carry out optional satisfaction surveys with its clients regarding the services/products sold, with a view to improving them.

Finally, where the client of COACHING DEVELOPPEMENT has expressly consented, personal data may be used for the purpose of transmitting commercial information.

6. Security of Collected Personal Data

COACHING DEVELOPPEMENT implements security measures appropriate to the sensitivity of the personal data collected, to protect it against any malicious intrusion, loss, alteration, or disclosure to unauthorised third parties.

COACHING DEVELOPPEMENT guarantees the security of information exchanged in the context of online transactions or payment acts.

COACHING DEVELOPPEMENT restricts access to its information system to authorised personnel who require such access to perform their duties.

COACHING DEVELOPPEMENT raises awareness among its staff and employees regarding the protection of personal data made available to them in the course of their duties, and ensures they comply with the applicable rules and the company's code of ethics.

7. Retention Period for Collected Personal Data

COACHING DEVELOPPEMENT does not retain personal data beyond the period necessary to achieve the purpose of the processing, while respecting the applicable legal and regulatory limits, or another period taking into account the operational constraints on which COACHING DEVELOPPEMENT depends.

With regard to clients of COACHING DEVELOPPEMENT, the majority of information is retained for the duration of the contractual relationship and for three years after the end of the contractual period.

With regard to prospects, information is retained for ten years from the date of collection or the last contact with COACHING DEVELOPPEMENT.

8. Information and Exercise of Rights

Data subjects whose personal data is collected have the right to access the personal data concerning them, to rectify or erase it, to restrict processing, to data portability, and the right to object to processing.

These rights may be exercised by sending an email to: contact@optitrainer.fr or by post to COACHING DEVELOPPEMENT at 384 chemin de Serres, Caromb, 84200 CARPENTRAS.

COACHING DEVELOPPEMENT undertakes to respond to any person who has exercised one of the aforementioned rights within one month of receiving the request.



This period may nevertheless be extended by two months taking into account the complexity and/or volume of requests to be processed.

In the event that the data controller refuses to act on a request for information made by the data subject, the controller shall state the reasons for the refusal.

The data subject has the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) or with the supervisory authority of the EU Member State in which they reside, and to seek judicial redress.

8.1 Right of Access

Any person may enquire of the data controller whether personal data concerning them is being processed. If so, the data subject may obtain a copy of the personal data being processed, along with the following information:

- purposes of the processing;
- categories of personal data concerned;
- recipients or categories of recipients of the data;
- where possible, the envisaged retention period for the data or, where not possible, the criteria used to determine that period;
- where personal data is not collected directly from the data subject, any available information as to its source;
- where applicable, the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

8.2 Right to Rectification

Any person whose personal data is being processed has the right to obtain the rectification of inaccurate personal data concerning them, and to have incomplete data completed where the purpose of the processing so requires.

8.3 Right to Erasure

Any person whose personal data is being processed has the right to obtain from the data controller the erasure of such data in the following cases:

- where the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- where the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;



- where the processing is based on the legitimate interests of the data controller;
- where the data subject objects to the processing and there is no overriding legitimate basis for the processing;
- where the processing is carried out for direct marketing or related profiling purposes and the data subject objects to such processing;
- where the personal data has been unlawfully processed;
- where the personal data must be erased in order to comply with a legal obligation under Union law or the law of the Member State to which the data controller is subject;
- the data controller may however refuse to erase data in the following cases:
 - to comply with a legal obligation requiring the processing, as provided for by Union law or French law;
 - where the processing is solely for statistical purposes;
 - where the processing is necessary for the establishment, exercise, or defence of legal claims.

8.4 Right to Restriction of Processing

Any person whose personal data is being processed may request from the data controller the restriction of processing in the following cases:

- where the data subject contests the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the data;
- where the processing is unlawful but the data subject does not wish to have the data erased;
- where the controller no longer needs the personal data for the purposes of the processing, but the data subject requires it for the establishment, exercise, or defence of legal claims;
- where the data subject has objected to the processing, pending verification as to whether the legitimate grounds of the controller override those of the data subject;
- where processing has been restricted, the data may, with the exception of storage, only be processed in the following cases:
 - with the consent of the data subject;
 - for the establishment, exercise, or defence of legal claims;
 - for the protection of the rights of another natural or legal person, or for important reasons of public interest of the Union or of a Member State.

If the restriction is subsequently lifted, the data controller shall inform the data subject in advance.



8.5 Right to Data Portability

Any person whose personal data is being processed may request from the data controller that their data be transmitted to them or to another data controller in the following cases:

- where the processing is based on the consent of the data subject;
- where the processing is necessary for the performance of a contract to which the data subject is a party, or for the implementation of pre-contractual measures taken at the request of the data subject;
- where the processing is carried out by automated means.

8.6 Right to Object

Any person whose personal data is being processed has the right to object to such processing under the following conditions:

- where the processing is based on the pursuit of the legitimate interests of the data controller or a third party, on grounds relating to the data subject's particular situation, and where the controller fails to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise, or defence of legal claims;
- where the processing is carried out for direct marketing or related profiling purposes, the data subject may object to such processing at any time and without condition.
- where the processing is carried out for statistical purposes, on grounds relating to the data subject's particular situation.

9. Privacy Protection

COACHING DEVELOPPEMENT maintains appropriate physical, electronic, and administrative security measures designed to protect personal information obtained from data subjects, clients, and prospects, in accordance with this Charter.

COACHING DEVELOPPEMENT takes all useful and necessary measures to limit intrusive actions by third parties and informs its clients of any electronic attacks.

The COACHING DEVELOPPEMENT website for the OPTITRAINER brand may contain hypertext links to third-party websites or online spaces for the convenience and information of data subjects.

These linked third-party websites may be operated by unaffiliated entities and may have their own privacy policies or notices.

COACHING DEVELOPPEMENT therefore recommends that persons visiting its websites consult the privacy policies of those third-party sites to understand how they may collect and use personal data.



COACHING DEVELOPPEMENT is not responsible for the content or privacy practices of third-party websites that COACHING DEVELOPPEMENT does not control.

10. Cookies

The COACHING DEVELOPPEMENT website uses cookies designed to facilitate navigation on the website, measure site traffic, or allow the sharing of website pages.

Cookies are placed on the terminal of data subjects for a maximum period of thirteen months from the moment the data subject gives their consent.

After this period, consent will be collected again.

10.1 Types of Cookies Used

Cookies required for navigation on the COACHING DEVELOPPEMENT website are strictly necessary for the functioning of the website. Deleting them may cause navigation difficulties.

Four types of cookies, serving the purposes described below, may be stored on the terminal of users when visiting the COACHING DEVELOPPEMENT website.

Type 1: Technical cookies are necessary for navigation on the COACHING DEVELOPPEMENT website and for access to the various products and services. They cannot be disabled or configured without preventing access to the site and/or its services.

Type 2: Audience measurement cookies are issued by COACHING DEVELOPPEMENT or by one of its technical service providers for the purpose of measuring the audience of the various content sections of the website, in order to evaluate and better organise them. These cookies only produce anonymous statistics and traffic volumes, excluding any individual information.

Type 3: "Social network" cookies allow content from the COACHING DEVELOPPEMENT website to be shared with others, or to inform others of a user's viewing or opinion of content on the COACHING DEVELOPPEMENT website.

10.2 Cookie Management

Users may accept or refuse cookies on a case-by-case basis, or refuse all cookies at once by configuring their browser. If the user chooses to refuse all cookies, access to certain pages of the COACHING DEVELOPPEMENT website may be limited.

For assistance regarding different browsers and how to delete cookies, COACHING DEVELOPPEMENT recommends consulting the official documentation provided by browser publishers.



11. Charter Updates

COACHING DEVELOPPEMENT may amend this Charter at any time, particularly due to the introduction of new services or technologies, or as a result of changes to the legislative and regulatory framework.

COACHING DEVELOPPEMENT recommends that data subjects consult this page as often as they wish to stay informed of any changes.

12. Employee Information and Publication

This Charter will be communicated individually to each employee of COACHING DEVELOPPEMENT. It will also be available on the Company's website.

13. Entry into Force

This Charter is applicable from the date of its publication.

Done at Carpentras, on 6 March 2026.