

PRIVACY POLICY OF THE SKILLVALUE.COM WEBSITE

V1. 201805

1. Introduction and general points

SkillValue Solutions SAS [simplified joint-stock company], registered in Orléans trade and companies register as number 829 682 384, and SkillValue Freelancers SAS, registered in Orléans trade and companies register as number 834 044 901, (having their registered offices at 1 rue des Hauts, 45380 LA CHAPELLE SAINT-MESMIN), in a capacity of entities responsible for processing, take respect for and protection of its users' privacy very seriously. The term "SkillValue" shall be used to refer jointly to SkillValue Solutions SAS and SkillValue Freelancers SAS.

SkillValue is attached to protecting and complying with its users' fundamental rights guaranteed by the law and regulations in force, and in particular the [General Data Protection Regulation](#) ("GDPR") which comes into force on 25 May 2018.

The purpose of SkillValue's Confidentiality Policy (the "Policy") is to inform its users transparently about its practices relating the collection, use and sharing of any information which they may introduce into its website (the "Site"), which is located at the following Internet address: <https://skillvalue.com>.

This Policy (together with the [General Terms and Conditions](#) and all documents to which reference is made and the Charter on use of Cookies) describe the way in which SkillValue processes the collected personal data supplied by its users. SkillValue asks the latter to read the present document carefully in order to learn of and understand its practices regarding the way their personal data is processed.

The terms used in the present Policy shall have the definitions given by the law in force and/or by the GDPR.

2. The information which SkillValue collects

SkillValue may collect and process the following data:

2.1. The information which it users send to it

By using its Site its users may send SkillValue information some of which enables them to be identified directly or indirectly (this is "Personal Data" within the meaning of article 4.1. of the General Data Protection Regulation, or "GDPR", and of article 2§2 of Law no. 78-17 of 6 January 1978 relating to computing, files and freedom or "Computing and Freedom Law").

This is so in particular:

- when users complete forms (for example the account-creation form),
- when they take QCM or Coding tests;
- when they participate in competitions;
- when they contact SkillValue;
- when they leave a comment on SkillValue's blog - whether by email or by any other means of communication - or when they inform SkillValue of a problem;
- when they sign up to receive SkillValue's newsletter.

This information contains the following data:

2.1.1. The data required to subscribe to the service which SkillValue provides on its Site or to access to all other services provided by SkillValue. This data of our users consists of:

- surname and first name;
- email address;
- password;
- City, country.

This information is mandatory. If you do not supply it SkillValue will not be able to provide the services offered by the Site and its users will not be authorised to create accounts on the Site.

SkillValue also collects the following, depending on what users provide:

- A photograph (only if a user attaches it to a curriculum vitae), or in their profile on the site;
- Place and date of birth (only if the user gives these in a curriculum vitae);
- A postal address (only if the user gives this in a curriculum vitae);
- Academic backgrounds (only if the user gives this in a curriculum vitae or if it is available on the social network or if the user mentions it on the Site);
- Copies of all exchanges between the users and SkillValue;
- Copies of all the publications on the SkillValue blog;
- Details of visits to the Site;
- If applicable, answers to polls after a test taken online;
- The replies given concerning tests taken or competitions with the time spent;
- Data which the users may provide at SkillValue's request when an online problem relating to its services or the operation of its site is flagged.

2.1.2. The social network links provided by the user or collected by SkillValue from freely accessible social networks.

2.2. Data which SkillValue collects automatically or indirectly

2.2.1. When SkillValue users come to the Site from social networks SkillValue will have access to certain data relating to their account on the said social networks, in accordance with the general terms of use of the social network in question (in particular the surname, first name, photograph, birthday, email address, telephone number, number of contacts, professional training and experience, miscellaneous experience, accomplishments, areas of interest, competence and recommendations, publications, professional situation), and depending on what each user has decided to publish on the said network.

2.2.2. When SkillValue client companies create a company profile with employee accounts they may give SkillValue information required to create these accounts. In particular this concerns the provision of email addresses, surnames and first names.

2.2.3. Personal data can also be collected by SkillValue when users interact with functions on the social networks, by clicking "Like" or leaving a comment.

2.2.4. Pursuant to the applicable legislation and in accordance with the [Cookies Charter](#), SkillValue may, during users' visits to its site, collect, with the latter's consent, if applicable, information relating to the networks from which they access the Site, such as the IP addresses, and also the data relating to the route taken to get to the Site. SkillValue may also collect the content which its users view, the route taken through various pages of the Site, and the search terms used.

2.2.5. SkillValue also collects information concerning use of the Site by its users, and in particular: the number of tests taken, test results and the dates on which the tests are taken.

2.3. Retention of your data

2.3.1. Except for the categories of Personal Data referred to in 2.2. and 2.3.3. below, and in addition to the data retention periods stipulated by the applicable law, users' Personal Data, SkillValue shall retain personal data supplied by users or collected indirectly, for as long as the user accounts are open, or until it is no longer necessary to use it in accordance with 3. below.

2.3.2. The following categories of Personal Data may be retained for different periods:

Contents created by users on the SkillValue Blog (such as comments and opinions) are made anonymous after the periods mentioned in 2.3.1, but remain visible on the Blog.

Users' email addresses may be retained after the period defined above, as an identifier only, as may test tokens and assessment details.

2.2.3 If an account is closed the user's personal data is usually deleted within a period of 24 hours. Within 30 days all user account data shall be deleted, with a few exceptions:

- If SkillValue must meet legal obligations pursuant to the applicable law;
- In accordance with 8.3 and 2.3.3. of the present Policy;
- SkillValue shall retain certain anonymised data for statistical purposes.

2.3.3. If a user account has been suspended or blocked the data is kept, from the moment of suspension, for a term of between 1 and 10 years, to prevent the user from evading the Site's [General Terms and Conditions](#).

3. How does SkillValue use the collected data?

SkillValue uses the collected data with the aim of:

- 3.1.** Assessing users' candidatures for a job offered by its clients;
- 3.2.** Putting a user in contact with a client of SkillValue for recruitment and/or for a Freelance mission;
- 3.3.** Due diligence: the stage of preparation for signature of a contract with a Client;
- 3.4.** Due diligence in order to allow verification and validation of online tests, QCM, Algoplay, etc.;
- 3.5.** Communicating with users;
- 3.6.** Letting users access the Site;
- 3.7.** Enabling users to use interactive functions with social networks, if they desire;
- 3.8.** Keeping users informed of offers matching the information given by them when they created their account, or on the basis of the results obtained in the tests, pursuant to the provisions, and with users' consent, when required by law. This information sent to the users may contain advice on how compatible users may be with the offers available on the Site, and users' data may be used to send them messages which may interest them;

- 3.9. Assisting authentication of the results obtained when taking tests on the Site;
- 3.10. Checking users' identities when creating their accounts, or checking all other data collected by SkillValue via social networks, in accordance with the general terms of use of them, and pursuant to the law in force;
- 3.11. Optimising management and operation of the Site and giving users a better experience;
- 3.12. Informing users of changes made to the Site;
- 3.13. Giving users access so that they can modify their profile and update it on the Site;
- 3.14. Ensuring that users comply with the General Terms of Use, the regulations in force and the present Confidentiality Policy;
- 3.15. Managing the Site to maintain an optimum level of use by our technical teams.

4. Who will receive the information collected by SkillValue, and why is this information sent to them?

4.1. To optimise use of its services, and only for this reason, some of SkillValue's users' information is sent to other companies in the Pentalog group, to which the company SkillValue belongs, in accordance with the Present Policy.

4.3. SkillValue therefore works in close collaboration with the companies in the Pentalog group and outside companies which can have access to the users' Personal Data; this is the case in particular

- for technical services,
- verification of users' identities
- suppliers of analytical solutions
- internal administration and accounts

4.4. SkillValue shares the data with the third parties mentioned in 4.3. only in the following cases:

4.4.4. When SkillValue makes use of suppliers of search engines and of analytical solutions to improve and optimise its Site and its services;

4.4.5. When using communication tools (social networks) or an email client to communicate with the users;

4.4.7. When SkillValue (1) has a legal obligation to comply with a writ, (2) in cases of urgency where the physical integrity of a person is under threat, (3) must cause a contract to be performed, or prepare for performance of a contract between its users and its clients, (4) to protect SkillValue's rights;

4.4.8. In the event of sale or purchase of a company or assets SkillValue reserves the option of sharing its users' personal data with the potential vendor or purchaser of this company or these assets.

4.4.9. If SkillValue or all or part of its assets are purchased by a third party data in its possession shall, if applicable, be transferred to the new owner.

4.4.10. Under the regulations in force, and with the consent of its users when required, SkillValue can their aggregate data and send it to the companies in the Pentalog group, including all or part of its users' personal data and the collected cookies. Use of such information shall be strictly constrained by the purposes described above.

4.4.11. If users allow SkillValue to have access to personal data via social networks this makes their confidentiality policy and terms of use binding only on the users. SkillValue has no control over the collection of the data or the way it is processed by these networks.

5. How does SkillValue use and moderate the comments?

SkillValue reads the comments left on its blog by users in order to provide assistance, to ensure that its users comply with the General Terms of Use, and to ensure that comments do not contain inappropriate content.

6. Emails which SkillValue sends

6.1. SkillValue may use the data supplied by its users when creating an account on the Site only pursuant to the legislation in force, and with the users' consent when required, in particular (1) to send invitations to participate in tests, quizzes, competitions or all other events which may interest users, or (2) to send offers of employment and/or of freelance missions which may interest users.

6.2. In its legitimate interests SkillValue may send emails to users who may be interested by its services or who have manifested an interest in its services.

6.3. Pursuant to the legislation in force, users may decide at any time no longer to receive emails from SkillValue by withdrawing their consent; to do so they must unsubscribe using the unsubscription link available under each email communication, or deselect the box concerned in their account, or by contacting SkillValue by sending an email with a description of the request to the following address: contact@skillvalue.com.

6.4. Concerning data of users who have not been collected directly by SkillValue, SkillValue shall uphold the right to be informed as defined by the GDPR at all times, when such users are first sent. They shall be able to decide to implement the rights stipulated in 6.3. at any time.

On social network platforms (for example Facebook, Twitter, etc.): all users may object to processing at any time, by configuring their account's advertisement-related settings;

On outside sites: Users can refer to the Charter on use of Cookies to understand how to withdraw their consent.

7. Where and how is SkillValue's users' data sent?

SkillValue keeps its users' personal data within the European Union.

However, in connection with use of the Site some user data may be transmitted to other countries which have local personal data protection legislation different to that of these users' country of residence.

This occurs in particular when the data is sent to third-party applications. SkillValue uses these third-party applications in order to enable operation of its services, to communicate with users, and to send information in preparation for signature of an employment contract with a client or a freelance mission.

This is also the case in respect of the companies in the Pentalog Group located outside the European Union to which SkillValue may transmit certain data in connection with provision of its services in these countries or certain administrative and accounting tasks.

When a transfer of this type is made SkillValue shall ensure that processing is undertaken in accordance with the present Policy, and that it guarantees a sufficient level of protection of users' personal data, either by incorporating the [Standard contractual clauses of the European Commission](#), or by joining the [Privacy Shield](#).

For the sake of complete transparency with regard to its users, SkillValue undertakes to supply on request a list of the countries where its users' personal data is kept in the European Union, and a list of countries through which data occasionally transits.

8. Users' rights over their personal data

8.1. Under the applicable law, and pursuant to articles 12 and following of the GDPR:

SkillValue's users are entitled to have access to personal data relating to them which is processed and held by SkillValue.

When such a request is made by a user SkillValue may, before replying, check the identity of the user, by asking them to provide more detailed information to enable their reply to be answered.

In the case of manifestly abusive, excessive or unjustified requests, in particular due to their number or their repetitive or systematic nature, SkillValue may either refuse to accede, by demonstrating the manifestly excessive or unjustified character, or demand payment of reasonable costs taking into account the administrative costs incurred to supply the information, make the communications or take the requested measures.

8.2. Under the applicable law, and pursuant to articles 12 and following of the GDPR, SkillValue shall reply to users as rapidly as possible and, in any event, one month of receipt of the user's request, or up to two months, bearing in mind the complexity and the number of requests.

In such cases SkillValue shall inform the user of the reasons for the deferral within a period of one month of receipt of the request.

SkillValue users who are account-holders have the possibility, in addition to the possibility of viewing the personal data held by SkillValue, to correct, modify or delete all incorrect information.

Users are responsible for giving SkillValue Information which is complete, accurate and up-to-date. They have the option of closing their account on the Site at any time.

All requests for modification or deletion may be made by contacting SkillValue directly in accordance with article 13 "Contacting SkillValue" below.

8.3. SkillValue may keep certain personal data of its users if this is imposed by the legislation of an EU Member State where it has its activities or if this is imposed by EU legislation. This will also be the case when SkillValue has a legitimate interest in doing so under the terms of the applicable law or of the GDPR. This may be so, in particular, when users act against the General Terms of Use and when SkillValue wishes to bring such actions to an end.

8.4. Under the applicable law, when this is the case, in particular in France pursuant to [new article 40-1 of the Computing and Freedom Law](#), users may give directives relating to retention, deletion and communication of their data after their death.

9. Cookies and similar technologies

Pursuant to article 7 of its General Terms and Conditions and in accordance with its [Cookies Charter](#), SkillValue uses cookies to personalise and optimise browsing and online time. For more information users can view the [Cookies Charter](#).

10. Confidentiality of your password

Each user is responsible for the confidentiality of the password they choose when creating their account on the Site.

SkillValue draws attention to the fact that it is the users' sole responsibility to keep this password, and not to communicate it to anyone. SkillValue also advises changing the password at regular intervals.

11. Links to other websites and social networks from the SkillValue Site

The Site may contain certain links to websites of companies in the [Pentalog Group](#), or outside companies. SkillValue informs its users that companies in the Pentalog Group have a very strict and transparent Confidentiality Policy, which can be viewed on their site, or which will be available very shortly. Concerning outside companies, it is the users' responsibility to examine their confidentiality policy before they send their personal data. SkillValue may not be held liable for the use made by these outside sites of data collected in this manner, and shall under no circumstances be answerable for the confidentiality policies of the said outside sites.

12. Modification of the confidentiality policy

SkillValue reserves the right to amend its Confidentiality Policy at any time. SkillValue shall publish all substantial amendments on its Site visibly, and it shall be applicable from publication. In such a case SkillValue shall contact its users if necessary via their email address or from their account. SkillValue strives to maintain total transparency with regard to its users concerning the use of their collected data, its subsequent use, and the third parties to which SkillValue intends to send it.

13. Contacting SkillValue

Users of the Site can contact SkillValue concerning all questions relating to the present Policy, or all requests relating to their personal data.

SkillValue may be contacted via its Site at the address contact@SkillValue.com or, to exercise the right guaranteed by the applicable law and by the GDPR by specifying clearly the object of the request and providing the necessary information allowing to revert to the requester.

Document updated on 25 May 2018.