

# News Decoder Privacy Policy

## I. Introduction

Your privacy is a priority for News Decoder. We are committed to protecting the personal data of site visitors, faculty and students at our partner schools, donors and prospective clients (“you” or, collectively, “users”); to processing it with the utmost care; and to ensuring it is protected in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

This privacy policy informs you about:

- The personal data we collect about you and the reasons for that collection
- The conditions for use of your personal data
- Your rights over your personal data and how to exercise them

The data controller responsible for processing your personal data is News Decoder, which is part of Nouvelles-Découvertes, a non-profit association under French law. News Decoder’s website is at the URL [www.news-decoder.com](http://www.news-decoder.com) (“the site”).

News Decoder makes news, multimedia content and information about News Decoder’s services and activities available to the public. It makes various educational resources such as e-Learning courses, publication guidelines, webinar materials, contests and event information (“educational resources”) exclusively available to faculty and students at our partner schools (“school registrants”).

The site also offers functionalities that enable you to contact News Decoder; request information from us in the form of brochures, newsletters or emails; complete payments pursuant to contractual obligations; and make donations to support our activities.

During your browsing and interaction with the site or with News Decoder, News Decoder may need to collect and process personal data about you, in the capacity of a data controller.

## II. What personal data do we collect?

News Decoder collects personal information from you in several ways. We collect information that you provide to us; information collected through your use of the site; and information collected from publicly available sources or third parties.

### a. Information that you provide

When you register, subscribe, donate or otherwise interact with our site, you may be asked to provide certain personal information. For example, if you register to access our educational resources, you will be asked to provide your name, email address and select other information. If you make a donation or complete a payment, you will need to provide information such as your credit card details.

### b. Information collected through your use of the site

We collect aggregated data about site users by using web analytics services such as Google Analytics and JetPack. Aggregated data does not enable us to identify individuals, but it does enable us to collect generic information about traffic flow and demographics. This aggregated data is collected automatically when you visit our site through the use of cookies and similar technologies.

### c. Information that we collect from publicly available sources or third parties

News Decoder may receive personal information about you through our own research of publicly available sources or from third party sources, as permitted by law, such as online marketing and data analytics databases.

### III. Why do we collect your personal data?

We collect personal data about you for various reasons. In general terms, we collect and use your personal data to fulfill our educational mission, fulfill our obligations to partner schools, generate revenue and optimise your experience on our site.

More specifically, we collect personal information for the following principal reasons:

- **To provide access to our educational resources:** We require school registrants' personal information to enable them to access and use our educational resources, correspond with our editorial team and communicate with other students, faculty or experts in News Decoder's network.
- **To communicate information:** We use personal data to keep users informed of our latest content, announcements, fundraising campaigns, contests and events.
- **To bill and collect payment from our partner schools:** We collect partner schools' information to effectively invoice and collect payment from them.
- **To collect donations:** We use donors' information to solicit and process donations and to inform them about how their contributions have been used.
- **To improve and maintain performance:** To provide school registrants with the best possible experience, we use personal information to understand how school registrants experience our site and educational resources so we can make improvements. This includes analysing onsite data and contacting school registrants with surveys or emails.
- **To administer contests and prize draws:** If a school registrant(s) enters a contest or prize draw, we will process his, her or their information in order to run the contest or administer the prize draw.
- **Recruitment:** If you apply for a job or internship via our site, we will process your information in order to facilitate the application process.

### IV. On what grounds do we collect your personal data?

We only use your personal data where we have a lawful basis for doing so, such as the following grounds:

- **User consent:** This is where you have given us explicit permission to process personal information for a given purpose. For example, if you complete one of the enquiry forms on our site, we ask for your express consent to use your data for the purpose of responding to your inquiry. You have the right to withdraw this consent at any time by contacting us as detailed below.
- **Contractual necessity:** This is where we have to process personal information to fulfill our contractual obligations. For example, we are required by our partnership agreements with partner schools to enable their faculty and students to access our educational resources, and we require the names and email addresses of their students and faculty to fulfill this obligation.
- **Legitimate interests:** This is where we have a legitimate business interest to process personal information. For example, where we are aware of copyright infringements, it is in our legitimate interests as a publisher to identify those responsible.
- **Legal obligation:** This is where we have to process personal information in order to comply with the law. For example, we process and retain donor information to comply with our reporting obligations to our fiscal sponsor and tax authorities.

### V. Who do we share your personal data with?

We disclose personal information to facilitate the running of our organization or to provide specific services you have requested. Commonly, we will disclose information to:

- **Service providers:** We engage service providers that support our organization and improve our site and services. These service providers include digital content and marketing services; customer relationship management platforms; payment providers; a fiscal sponsor; and organisations that host our site or data.
- **Correspondents:** We may provide school registrants' personal data to our correspondents for the purpose of enabling them to assist with offering subject matter expertise, editing the school registrant's multimedia content, leading workshops or participating in webinars with our partner schools.
- **Other partner schools:** We may provide school registrants' personal data to educators or students at our other partner schools for the purpose of facilitating educational opportunities, including participation in a webinar or collaborative creation of multimedia content.
- **Other users:** Parts of our site are publicly accessible to anyone around the world. Other public visitors will be able to see comments you post on an article. We encourage you to use a pseudonym when commenting on our site if you do not wish to be identifiable to other readers.
- **Legal processes and successors in title:** We, and our suppliers, may disclose your information to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply our partnership agreement or any of our other rights.

## VI. What are your rights over your personal data and how can you exercise them?

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These rights include:

- The right to object to direct marketing;
- The right to access the personal data that we process about you;
- The right to request the deletion or correction of your personal data.

You can exercise these rights as detailed below.

If you wish to withdraw your consent or change your personal information, you can:

- **Account:** School registrants can update their account information by logging into their online account and visiting "Edit My Profile."
- **Email:** To unsubscribe from email communications from News Decoder please click the unsubscribe link or other method indicated in the footer of our communications. Your opt-out applies to the type of communication that you unsubscribe from, and you may continue to receive emails from other services you've subscribed to as well as essential transactional communications.
- **Cookies:** Most browsers are initially set up to accept cookies but offer a number of ways to control cookie preferences. Typically, users can: disable all cookies, require approval each time a site attempts to place a cookie, remove cookies manually or have them deleted automatically after a certain period. For step-by-step instructions on how to modify cookie preferences, please consult your browser's support documentation. You can find instructions for commonly used browsers here:
  - [Google Chrome](#)
  - [Firefox](#)
  - [Safari](#)
  - [Microsoft Edge](#)

You can also exercise your personal data rights by sending us an email at [nelson.graves@news-decoder.com](mailto:nelson.graves@news-decoder.com). The email should detail the purpose of your email and the actions you would like us to take

in respect of your personal data. We may require you to provide personal information to confirm your identity or prove the accuracy of the change you are seeking.

## **VII. How long do we keep your personal data?**

News Decoder has established rules concerning how long we retain your personal data. The length of time varies depending on the different purposes for collecting the data and takes account of any legal obligations to retain some of your data.

The retention time within News Decoder is defined to allow us to process your requests, fulfill our contractual obligations and conduct communication and marketing operations while complying with the principle of proportionality according to which personal data must not be retained for longer than necessary to fulfil the purpose for which it was collected.

However, all of this data may be retained for longer than the lengths of time mentioned in this article:

- with your consent;
- in the form of archives, to respond to any legal or regulatory obligations applicable to News Decoder; or
- in the form of data reused for the purposes of logs, statistics or research.

## **VIII. How we keep your personal information secure?**

News Decoder has appropriate technical and administrative security measures in place to help ensure that your information is protected against unauthorised or accidental access, use, alteration or loss by unauthorised third parties.

We operate a global organization, so your personal information may be processed and stored outside the European Economic Area. We put in place contractual safeguards to protect information that is transferred to third parties.

In the event that a data breach occurs, News Decoder shall do its utmost to mitigate the risks and take all adequate corrective actions or measures, including informing the national authority responsible for personal data protection and, where relevant, data subjects.

## **IX. How to contact us**

If you have any questions about our privacy policy, the data we hold on you, or would like to exercise one of your data protection rights, please do not hesitate to contact us.

The data controller responsible for processing your personal data is News Decoder, which is part of Nouvelles-Découvertes, a non-profit association under French law.

You can contact us at:

Email: [nelson.graves@news-decoder.com](mailto:nelson.graves@news-decoder.com)

Tel: 33.6.6066.0868

Mail: 18 rue d'Alembert, 75014 Paris, France

## **X. How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that News Decoder has not addressed your concern in a satisfactory manner, you may contact the French data protection authority via the [CNIL website](#) or by writing to the following address:

Commission Nationale de l'Informatique et des Libertés  
3 Place de Fontenoy - TSA 80715  
75334 PARIS CEDEX 07

#### **XI. Changes to this policy**

This privacy policy may be amended at any time, particularly to take account of any changes to the law or regulations or changes to our services. Any changes we may make to this privacy policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.

When we publish changes to this policy, we will revise the "last updated on" date at the bottom of this policy.

Last updated: April 14, 2020