

# PRIVACY POLICY

## EUROPEAN FILM FACTORY

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Welcome to the website of the **European Film Factory program**, led by the Institut français. Any changes that the Institut français will make to this Privacy Policy will be posted on this page. We recommend that you check this page frequently for updates to the Privacy Policy.

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## INTRODUCTION

This Privacy Policy describes the processing activities carried out by the Institut français concerning your Personal Data in connection with your use of the European Film Factory website at [www.europeanfilmfactory.eu](http://www.europeanfilmfactory.eu) (the “Site”).

Please send your questions, comments and requests regarding this Privacy Policy to the following email address [dpo@institutfrancais.com](mailto:dpo@institutfrancais.com).

Term	Definition
<b>The Institut français</b>	A public establishment of an industrial and commercial nature, the Institut français is the public institution in charge of France’s external cultural action. Its head office is located at 8-14 rue du Capitaine Scott, 75015 Paris. The Institut français is the data controller for the Processing activities described in this Privacy Policy.
<b>Recipient</b>	Natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed.
<b>Personal Data</b>	Any information relating to an identified or identifiable natural person that enables him/her to be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
<b>Purposes</b>	Goal pursued by the Institut français for the Processing of your Personal Data.
<b>Legal basis of the Processing</b>	Legal basis on which the Processing is carried out in accordance with Articles 6 to 9 of the GDPR.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation).
<b>Processing</b>	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Data transfer outside the EEA</b>	Any transfer of personal data from the European Union to a country outside the European Economic Area (EEA), namely Austria, Belgium, Bulgaria, Croatia, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom, Iceland, Liechtenstein and Norway.

## OVERVIEW OF THE DATA PROCESSING CARRIED OUT BY THE INSTITUT FRANÇAIS

The table below summarises the data Processing carried out by the Institut français. You may refer to the sections below for further information on our Processing.

Purposes of the Processing	Legal basis	Recipients	Data transfer outside the EEA	Retention period
<b>Creation of your user account</b>	Execution of the public interest mission of the Institut français in charge of promoting French culture internationally	French Cinema department  OVH - Site Hosting  Arte France Développement, - service provider in charge of technical developments and hosting of the Site	No	Until the deletion of your user account which will take place after 3 years of inactivity on the account.
<b>Maintaining your user account</b>	Execution of the public interest mission of the Institut français in charge of promoting French culture internationally	French Cinema department  OVH - Site Hosting  Arte France Développement, - service provider in charge of technical developments and hosting of the Site	No	Until the deletion of your user account which will take place after 3 years of inactivity on the account.
<b>Verification of the country in which you are connecting via the IP address of the connection terminal</b>	Legal obligation of the Institut français to make sure that the rights of the films broadcast have been transferred to the Institut français in the country in which you are connecting.	OVH - Site Hosting  Arte France Développement, - service provider in charge of technical developments and hosting of the Site	No	For the duration of your connection to the Site.

<b>Management of your requests via the contact form and the messaging system</b>	Legitimate interest of the Institut français to answer to requests from users of the Site	French Cinema department OVH - Site Hosting  Arte France Développement, - service provider in charge of technical developments and hosting of the Site	No	3 years after the last contact with you.
<b>Production of anonymised statistics</b>	Legitimate interest of the Institut français to know how users use the Site and to report on its actions to its partners.	French Cinema department OVH - Site Hosting  European Schoolnet, ARTE Education and the European Commission	No	For the time needed to produce the statistics.
<b>Providing access to the Site (cookies)</b>	Legitimate interest of the Institut français to provide a service of quality to its users.	French Cinema department OVH - Site Hosting  Arte France Développement, - service provider in charge of technical developments and hosting of the Site	No	13 months.
<b>Litigation management</b>	Legitimate interest of the Institut français in the establishment of evidence in the defense of its rights in court.	External advisors (e.g. lawyers, accountants, tax specialists)	No	For the duration of the limitation period related to the claim.

## WHAT CATEGORIES OF PERSONAL DATA ABOUT YOU ARE COLLECTED?

The information you provide to the Institut français. You provide information to the Institut français:

- at the time of your registration, for example:
  - **if you are a teacher**: your surname, first name, email address, the address of your school, your postcode, your city and country of residence, the subjects you teach, the grade level at which you teach;
  - **if you are a student**: your last name, first name, date of birth
- by using the Site, for example: movies you have seen, educational kits you have downloaded (teacher only), extracts and mind maps you have created and shared or that have been shared with you.

Technical information. When you visit the Site, the Institut français collects the information provided by your computer, mobile phone or any other terminal. For example: the IP address, the type of browser you use, the type of terminal from which you connect.

## ON WHAT LEGAL BASIS ARE YOUR PERSONAL DATA PROCESSED?

As described in the table above, the Processing implemented by the Institut français are based on (i) the public interest mission entrusted to the Institut français, (ii) compliance with its legal obligations or (iii) the legitimate interests of the Institut français.

You may not object to these Processing when they are implemented to comply with a legal obligation.

When the Processing is based on the legitimate interest of the Institut français, you may object to it. To do so, please refer to Section 8 concerning your rights.

## COOKIES

For any information concerning the cookies used by the Institut français, please refer to the Site's [Cookies Policy](#).

## TO WHOM ARE YOUR PERSONAL DATA DISCLOSED?

The Institut français does not sell or rent your Personal Data to third parties.

In addition, the Institut français does not share your Personal Data with other persons, except in the cases described in the summary table above. These Recipients are as follows:

- OVH, the host of the Site, located in France and which stores your Personal Data in France;

- Arte France Développement, is the service provider in charge of the technical developments and hosting of the Site, located in France and which stores your Personal Data in France;
- European Schoolnet, a network of 34 European Ministries of Education aiming to bring innovation in teaching and learning;
- external advisors from the Institut français (e.g., lawyers, accountants, tax specialists); and
- the Institut français' French Cinema department.

We will also share your Personal Data to third parties in the event that the Institut français sells any business and/or assets, and that your Personal Data are concerned by this sale.

The Institut français will share your Personal Data with law enforcement agencies, public authorities or other organisations if legally required to do so.

## **ARE YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE EUROPEAN ECONOMIC AREA?**

The Recipients of your Personal Data are located in France or in a Member State of the EEA. Should transfers outside the EEA take place in the future, the Institut français will ensure that such transfers are regulated in accordance with the applicable regulations and will update this policy.

## **FOR HOW LONG ARE YOUR PERSONAL DATA KEPT BY THE INSTITUT FRANÇAIS?**

The Institut français keeps your Personal Data for the periods indicated in the summary table above.

When you have stopped using the Site, the Institut français stores your Personal Data in an aggregated and anonymous format.

## **YOUR RIGHTS**

In certain circumstances, you have rights in relation to the Personal Data the Institut français holds about you.

The table below sets out an outline of those rights and how to exercise them. Please note that the Institut français will require you to verify your identity before responding to any requests to

exercise your rights. To exercise any of your rights, please email [dpo@institutfrancais.com](mailto:dpo@institutfrancais.com). Please note that of the rights below, if the Institut français has valid legal reasons to refuse your request, the Institut français will inform you.

Right	Content
<b>Access</b>	You have the right to know whether the Institut français processes Personal Data about you, and if the Institut français does, to access Personal Data the Institut français holds about you and certain information about how the Institut français uses it and who the Institut français shares it with. You can request a copy of these Personal Data.
<b>Portability</b>	You have the right to receive a subset of the Personal Data you provide the Institut français in a structured, commonly used and machine-readable format and a right to request that the Institut français transfers such Personal Data to another party if the Institut français processes it on the bases of your consent and when the processing is carried out by automated means.
<b>Correction</b>	If you believe that the Personal Data the Institut français holds about you are inaccurate or incomplete, you have the right to request its correction or modification.
<b>Erasure</b>	You may request that the Institut français erases the Personal Data the Institut français holds about you in the following circumstances: (i) where you believe it is no longer necessary for the Institut français to hold the Personal Data, (ii) the Institut français is Processing it on the basis of your consent and you wish to withdraw your consent, (iii) the Institut français is Processing your data on the basis of the Institut français' legitimate interest and you object to such Processing, or (iv) you believe the Institut français is unlawfully Processing your data.
<b>Restriction of Processing</b>	You have a right to require the Institut français to restrict of Processing the Personal Data the Institut français holds about you in the following circumstances: (i) if you dispute the accuracy of your Personal Data, (ii) if the Processing is unlawful and you object to its deletion, (iii) if you believe that the Institut français no longer needs your Personal Data but that it is still necessary for you to establish, exercise or defend your legal rights or, (iv) if you have objected to the Institut français Processing Personal Data the Institut français holds about you.
<b>Objection</b>	You have the right to object to the Processing of the Personal Data the Institut français holds about you and the Institut français will consider your request. Please provide the Institut français with detail as to your reasoning so that the Institut français can assess whether there is a compelling overriding interest in the Institut français continuing to process such data or the Institut français needs to process it in relation to legal claims.

## COMPLAINTS

In the event that you wish to make a complaint about how the Institut français processes your Personal Data, please contact the Institut français at the following email [dpo@institutfrancais.com](mailto:dpo@institutfrancais.com). The Institut français will endeavour to deal with your request as soon as possible.

This is without prejudice to your right to launch a claim with the data protection supervisory authority in the European Union country in which you live or work where you think the Institut français has infringed data protection laws.