1. Preamble

Our personal data protection policy is designed to build a relationship of trust between you and our services, in order to offer you a positive experience in a fully transparent manner. Thanks to this policy, we will be able to take your requirements into account and meet your expectations. In order to honour the trust you place in **OCEAN SKILLS**, we guarantee, as a matter of priority, respect for your personal data and the confidentiality of our customers.

In order to be fully transparent with you and to guarantee your secure use of our website www.ocean-skills.com in all its available versions and related applications (hereinafter the **"OCEAN SKILLS Site"**), we inform you of the way in which we process your data, so that our services always respect your rights. In this way, we ensure the security and confidentiality of your privacy and of your data, and that they are not altered, across all of our platforms.

Accordingly, through this personal data protection policy, **OCEAN SKILLS** undertakes to comply with the essential principles of the European General Data Protection Regulation and of French law on the protection of personal data, by providing you with information on the existence and terms of the data processing applied here and on the rights you have regarding your data, and by applying these rights ourselves. Any information relating to possible transfers to a third country or to recipients is also made available, as well as the retention period of the data collected and the security measures.

1. Data subjects

This notice concerns you if you are:

- A visitor to the Ocean Skills Site
- An individual customer or user of our platform

2. Personal data processed by OCEAN SKILLS

As data controller, **OCEAN SKILLS** determines the purposes and means of the processing of your personal data collected via this site.

a. Collection of personal data

Personal data may be collected:

- **Directly via forms: for example, when you subscribe to our newsletter.**
- **Indirectly via tracking pixels or cookies. These are used to collect browsing data and to offer personalised advertising. For more details, please see our cookie policy:** https://www.ocean-skills.com/cookies.

b. Categories of personal data processed by OCEAN SKILLS

In the context of your working relationship with **OCEAN SKILLS**, the following categories of personal data are mainly collected:

- Identification data (surname, first name, username, email address);
- Connection data (IP address, event log, browsing history, user experience).

c. Legal basis for the collection of your personal data

In accordance with the regulations on the protection of personal data, **OCEAN SKILLS** collects your personal data and carries out processing operations that respect your rights.

Each processing operation carried out by **OCEAN SKILLS** is based on the following legal grounds:

- The performance of a contract;
- Consent.

d. Retention periods applied to your data

Personal data are kept for the period necessary for the purposes for which they are collected. This means that they are generally kept for the duration of the contract plus the applicable statutory limitation periods.

Longer retention periods may be set in order to comply with the legal or regulatory obligations to which **OCEAN SKILLS** is subject.

e. Recipients of the personal data processed by OCEAN SKILLS

OCEAN SKILLS ensures that only authorised persons can access your personal data.

OCEAN SKILLS does not disclose your personal data to other companies for commercial prospecting purposes. We sometimes use the services of other companies in order to respond to our customers' requests. Some of your information is transmitted to subcontractors for the performance of our services, but always with administrative, technical and physical security measures in place to protect it against any unlawful disclosure, use, modification or destruction by third parties.

It may also be disclosed to third parties in order to comply with legal or regulatory obligations, or to allow the performance of specific contractual measures.

f. Data transfers outside the EU

No personal data are transferred to countries outside the European Union. Your data are processed exclusively within the EU, in accordance with the regulations in force.

3. Details of the personal data processing operations

The processing operations carried out by **OCEAN SKILLS** serve, in particular, the following purposes:

Activity	Purposes of the processing	Legal basis	Retention period
Placement of functional cookies	Ensuring the operation and security of the website.	Legitimate interest in offering online content, ensuring the proper operation of the site and securing it	**13 months maximum** (For more information, please see the site's cookie policy)
Placement of optional cookies	Obtaining statistics. Offering personalised advertising.	Consent	**13 months maximum** (For more information, please see the site's cookie policy)
Personal account	Creation of a personal account allowing online orders to be placed.	Performance of pre-contractual measures	**3 years** from the last activity
Purchase of a service	Confirmation, validation and collection of payment, subscription management. Provision of the services.	Performance of a contract	**5 years** from the end of use of the service, then archived for 5 years.
Payment made on our partner platform	Making payments.	Performance of a contract	Not kept by **Ocean Skills**
Sending of emails about new content	Informing our customers and improving the user experience.	Legitimate interest	Duration of the contract
Commercial prospecting of users who have taken a free trial of the platform	Following up with a user who has tried the platform free of charge.	Legitimate interest	3 years from the end of the user's free trial of the platform
Newsletter (containing promotional offers)	Providing information on the latest news and deals	Consent	Until consent is withdrawn
Emailing of commercial offers	Communicating commercial offers	Consent	Until consent is withdrawn
Optimisation of emailing campaigns	Measuring and optimising the performance of our emailing campaigns	Consent	25 months from collection, or until consent is withdrawn if this occurs earlier

Activity	Purposes of the processing	Legal basis	Retention period
After-sales service	Managing and following up requests for assistance, complaints, incidents, returns, repairs and warranties in order to respond to the customer and resolve any difficulties encountered with the products or services provided.	Performance of a contract	Duration of the contract
Recruitment	Assessing the application	Performance of pre-contractual measures taken at the candidate's request Legitimate interest in assessing the application	Until the decision is made (3 months maximum)
Retention of a candidate's CV	Keeping the profile of an unsuccessful candidate in order to contact them again should new opportunities arise.	Consent	2 years maximum from the last contact with the candidate, renewable upon request for consent

4. Security measures

Having regard to the nature of the personal data processed and the risks presented by the processing, **OCEAN SKILLS** takes all the technical, physical and organisational measures necessary to preserve the security and confidentiality of personal data and to prevent them from being distorted or damaged, or accessed by unauthorised third parties.

OCEAN SKILLS chooses subcontractors or service providers that offer guarantees in terms of quality, security, reliability and resources to ensure the implementation of technical and organisational measures, including with regard to the security of processing. Subcontractors and service providers undertake to comply with levels of confidentiality at least equivalent to the standards in force within **OCEAN SKILLS**.

In addition, we are compliant with the payment card industry security standard PCI DSS, which reflects our commitment to security.

When it transfers personal data outside the European Union, **OCEAN SKILLS** does so only in accordance with legal instruments that comply with the applicable regulations in force.

5. Your rights

OCEAN SKILLS is particularly attentive to respecting your rights. In accordance with the regulations on the protection of personal data, you have the right:

- To obtain information about the processing operations carried out;
- To access your data;
- To have your data rectified;
- To have your data erased or to exercise your right to be forgotten;
- To data portability;
- To exercise your right to object;
- To exercise your right to restriction of processing;
- To set out instructions regarding your personal data in the event of your death.

a. How to exercise your rights

You can exercise your rights via a form at the following link: link.

To do so, you must clearly state your surname(s) and first name(s) and the address to which you would like the reply to be sent.

As a rule, you may exercise all of your rights free of charge. However, with regard to the right of access, you may be asked to pay a reasonable fee based on administrative costs for any copy of the data you request.

All the rights you have are detailed below.

b. Your right of access and rectification

You have a right of access and rectification with **OCEAN SKILLS**.

Under this right of access, you can obtain confirmation as to whether or not personal data concerning you are being processed and, where they are, access to that personal data.

You can ask **OCEAN SKILLS** to rectify or complete your personal data, as the case may be, if they are inaccurate, incomplete, ambiguous or out of date.

c. Your right to erasure and to be forgotten

You may obtain from **OCEAN SKILLS** the erasure of your personal data in the cases listed in Article 17 of the GDPR.

However, please note that it will not be possible to exercise this right to erasure where the retention of the personal data is necessary:

- For exercising the right of freedom of expression and information;
- For reasons of public interest in the area of public health, in accordance with legislation or regulations;
- For archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes;

- For the establishment, exercise or defence of legal claims.

d. Your right to data portability

You have a right to the portability of your personal data, that is, the right to ask to receive your personal data in a structured, commonly used and machine-readable format in order to transmit them to another entity.

This right is, however, limited to processing based on consent or on a contract, and to the personal data that you have personally generated.

This right does not include derived data or inferred data, which are personal data created by **OCEAN SKILLS**.

e. Your right to object

You have the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you where the processing is based on the legitimate interest of the data controller, which includes the sending of communications by email.

If you exercise this right to object, **OCEAN SKILLS** will stop the processing, except where there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or where the processing is necessary for the establishment, exercise or defence of legal claims.

f. Your right to restriction

You may request the restriction of the processing of your personal data in the cases provided for in Article 18 of the GDPR.

g. Your right of appeal

You have the right to lodge a complaint with the CNIL, without prejudice to any other administrative or judicial remedy.

You may lodge this complaint with the supervisory authority of the Member State in which your habitual residence or place of work is located, or in which the alleged infringement took place.

h. Your right to set out post-mortem instructions

You may set out instructions concerning what happens to your personal data after your death.

In this respect, you may set out general or specific instructions. General instructions concern all of the personal data relating to the person and are registered with a certified trusted third party responsible for ensuring that the wishes of the deceased are respected. This third party will be designated by decree.

Specific instructions are registered directly with **OCEAN SKILLS** with regard to the personal data processed. If this is the case, **OCEAN SKILLS** will respect the instructions registered with it upon the

death of the person.

i. Possibility of lodging a complaint with the CNIL

After contacting us, if you consider that your “Informatique et Libertés” (French Data Protection Act) rights are not being respected, you may contact the CNIL (the French data protection authority).

Online: https://www.cnil.fr/fr/plaintes

By post:

Commission nationale de l'informatique et des libertés
Service des plaintes
3 Place de Fontenoy
TSA80715
75334 PARIS CEDEX 07

6. Updates to our personal data protection policy

This policy may be updated periodically and without notice in order to remain compliant with the regulations in force on the protection of personal data and to take account of changes to our services.

Last updated: 10/09/2026