



# Thuasne Academy - Privacy Policy

**Date updated: September 16, 2025**

The purpose of this document is to describe and inform you about how THUASNE, SAS, with a share capital of € 1,950,000, registered with the Nanterre Trade and Companies Register under number 542 091 186, having its registered office at 120, rue Marius Auphan 92300 LEVALLOIS-PERRET, France, acting as Data Controller and THUASNE's Affiliates, listed as Joint Controllers [\[See list at end of this document\]](#), undertakes to collect, use and protect your Personal Data in connection with your use of Thuasne Academy in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR"), with all due care and exclusively for the legitimate purposes for which it was collected.

If you have any questions regarding our Privacy Policy, please contact us at: [academy@thuasne.com](mailto:academy@thuasne.com)

## 1. DEFINITIONS

For the purposes of the Privacy Policy, the following terms are defined as follows:

**"Platform"**: refers to the Thuasne Academy website (<https://thuasneacademy.learnupon.com>) and includes all of its functionalities and services.

**"Services"**: refers to the functionalities offered by THUASNE via the Platform. features and services offered by THUASNE via the Platform.

**"User(s)" or "You"**: Refers to You as a user authorized to access the Platform and use the Services under the conditions set out in the Platform's Terms of Use.

**"THUASNE's Affiliates" or "Affiliates"** : refers to any company or entity affiliated with THUASNE that:

- (i) Directly or indirectly controls THUASNE (parent company or entity);
- (ii) Is directly or indirectly controlled by THUASNE (subsidiary);
- (iii) Is directly or indirectly controlled by a company or entity mentioned in (i) above (sister company); being understood that the term « control » means direct or indirect possession of at least 50% of the voting rights in such a company or entity.

**"we", "us" and "our"**: refers to THUASNE and THUASNE Affiliates listed below that have deployed the Platform in their respective countries.

**"Personal Data" or "Data"**: means personal data as defined in Article 4.1 of the GDPR.

## 2. WHAT PERSONAL DATA DO WE COLLECT?

When using the Platform, THUASNE collects, uses and stores the following Data about You:

- First name
- Last Name
- Email Address
- Job Title
- Medical Specialty
- Areas of Interest
- Country of Practice



- Post Code
- Country Name or Customer Code
- Connexion data (login, session count)
- Activity tracking (course completion, course enrollment)

As well as any other Personal Data that you may spontaneously provide to us in the context of your exchanges with our services.

THUASNE generally collects Data about You that You agree to provide to us directly, from the Platform and/or through other channels.

### **3. WHAT ARE THE PURPOSES FOR COLLECTING AND USING YOUR DATA?**

THUASNE collects, uses, stores for a limited period, and processes your Personal Data to meet different purposes:

- A. To offer access to the Platform;
- B. To customize our Platform to your profile;
- C. To improve your overall user experience;
- D. To contact you with new courses/learning paths that match your area of interest;
- E. To create and update our Thuasne Customer Relationship Management database in order to send information about the Thuasne Group and/or Thuasne Products for example.

### **4. WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR DATA?**

The processing of your Data for the aforementioned purposes is justified by the following legal grounds:

- the performance of the contract entered into or to be concluded between You and us (Art. 6.1 b) GDPR), e.g. to offer you access to the Platform;
- to meet our legitimate interest (Art. 6.1 f GDPR), e.g. create and update our Thuasne Customer Relationship Management data base, contact you with new course...

### **5. HOW LONG WILL YOUR DATA BE STORED?**

Your Personal Data will be kept for as long as is necessary to achieve the purposes of the processing carried out by us, or for as long as is required by law.

We may also retain your data for the duration of the limitation period established by law, where such a period is applicable, even when the objectives pursued by the processing carried out have been achieved.

By way of information, in the context of the use of the Platform and Services, the retention periods we apply are as follows:

- Your Data stored on the Platform will be deleted 3 years after the last connection to the Platform, unless the User asks us to delete their Data before this period.
- You also have the possibility to delete your account on the Platform at any time, directly from your personal space.



Please note that the deletion of your Platform account deletes only your Data stored on the Platform and doesn't result in the deletion of all your Data collected by THUASNE e.g. the Data present in our Customer Relationship Management Data base. However, you may at any time exercise your rights of access, rectification, opposition, deletion, limitation of processing and portability of Data by writing an e-mail to [academy@thuasne.com](mailto:academy@thuasne.com).

## **6. RECIPIENTS AND DATA PROCESSORS**

The Data we collect is intended for THUASNE's internal services. However, we may share your Data when You use our Platform and Services, particularly when it is necessary for the management of the Platform and the provision of associated Services.

Under no circumstances will THUASNE transmit your Data to third parties for other commercial and/or promotional purposes without your consent. THUASNE reserves the right to transmit Data to its service providers acting as data processors within the meaning of the GDPR, exclusively in order to achieve the purposes mentioned in Article 3 above. We also inform You that we may be required to transmit your data to the competent administrative or judicial authorities, at their request, if required by current regulations.

## **7. DATA HOSTING AND TRANSFERS**

Your Data are stored on servers located within the European Union (AWS facility in Dublin, Ireland)

In the event that one of our subcontractors is required to transfer your Data outside the European Union to a country that has not been the subject of an adequacy decision by the European Commission, we ensure that the latter undertakes to provide and implement security measures and a specific framework (Standard Contractual Clauses of the European Commission, BCR, etc.).

## **8. SECURITY**

We do everything we can to protect your Data and prevent data breaches or hacks. In order to ensure the confidentiality, integrity and availability of your Data, we implement a number of security measures including:

- The encryption of data transiting between your browser and our Platform, as well as those stored on our servers.
- We strive to maintain our Platform at an optimum level of security according to current recommendations.
- Rigorous access controls to Data strictly limited to THUASNE and its data processor or authorized third parties who need it in order to provide the Services. Specific access levels are defined based on the responsibilities of each individual.

However, we do not control all the risks associated with the operation of the internet and draw your attention to the existence of potential risks inherent in its use and operation. By agreeing to our Privacy Policy and using our Services, You acknowledge that You have been informed of this risk and agree to use our Services at Your own risk. In the event of a data breach, we will notify You via the contact details You have provided, which may include your email address, phone number, or postal address.

## 9. COOKIES

This Platform uses cookies. A cookie is a small file that is placed by our web server on your computer. These files are typically used to identify that computer and the user.

On our Platform we only use essential and functional cookies which are necessary for the proper functioning of the Platform.

Please note that cookies do not allow us to take control of your computer in any way. They are strictly used to identify your computer in order to provide the services described here.

Cookies Thuasne Academy / Learn Upon: [https://www.learnupon.com/privacy-policy/#cont\\_4](https://www.learnupon.com/privacy-policy/#cont_4)

Cookies can be deleted at any time by visiting your web history and deleting all data. You can also delete cookies specific to our website via most browsers. You can also prevent the installation of cookies by blocking cookies in your browsers. Since our websites rely on cookies to function, our website will no longer function properly.

## 10. QUESTIONS AND COMPLAINTS

In accordance with the provisions of Law No. 7817 of January 6, 1978, relating to data processing, files and freedoms and EU Regulation 2016/679 relating to data protection of April 27, 2016, You have the following rights:

- a right of access and rectification allowing You to modify, complete or update your Personal Data;
- a right to delete inaccurate, incomplete, ambiguous or outdated Data;
- a right to object to the processing of your Data for legitimate reasons;
- a right to object, without reason, to the use of your Data for prospecting purposes;
- the right to define directives concerning the fate of your Data after your death;
- a right to Data portability, in a structured, commonly used and machine-readable format ;
- a right to limitation of processing, under the conditions referred to in Article 18 of European Regulation no. 2016/679 of April 27, 2016 ;
- the right to lodge a complaint with the competent supervisory authority of your country – [\[See list at end of this document\]](#).

Excluding the right to complain to the relevant supervisory authority above, all of the aforementioned rights can be exercised at any time, by attaching proof of identity, to [academy@thuasne.com](mailto:academy@thuasne.com).

## 11. INFORMATION REGARDING THE PRESENCE OF LINKS TO OTHER WEBSITES

Our Platform may contain links to other platforms or services of the Thuasne Group and/or third parties. This Privacy Policy solely governs the use of all content located on this Platform.

Be sure to read the documentation and privacy policy of all external services and websites linked to the Platform. The Thuasne Group cannot be held responsible for elements related

to the protection of personal data or any other element on external sites not managed by Thuasne Group companies.

## 12. PRIVACY POLICY CHANGES AND VERSIONS

We reserve the right to change this Privacy Policy at any time, so please review it regularly. Changes and clarifications will come into effect immediately upon publication on the Platform. If we make any changes to the content of this Policy, we will notify You here of the update, so that you are aware of what information we collect, how we use it, and under what circumstances we disclose it, if it is appropriate to do so.

In addition, it is specified that in the event of any contradiction or difference between the provisions of this French version of the Privacy Policy and its English version made available on the Platform, the French version shall prevail.

<b>Thuasne Affiliates/Subsidiaries - Joint Controllers</b>	
<b>Country</b>	<b>Joint Controller</b>
<b>France</b>	<b>THUASNE, SAS</b> , 120, rue Marius Auphan 92300 Levallois-Perret, France
<b>United Kingdom</b>	<b>Thuasne UK Ltd</b> , Unit 4 Orchard Business Centre, North Farm Road, Tunbridge Wells, Kent TN2 3XF, United Kingdom
<b>Nederland, België, Luxemburg</b>	<b>Thuasne Benelux B.V.</b> , Klompenmaker 1-3, 3861 SK Nijkerk, Nederland
<b>Australia</b>	<b>Thuasne Pacific Pty Ltd</b> , Unit 6,640-680 Geelong Rd, Brooklyn, Victoria 3012, Australia
<b>España</b>	<b>Thuasne España</b> , c/ Albasanz, 67 1º, oficina 23, 28037, Madrid, España
<b>Deutschland &amp; Österreich</b>	<b>Thuasne Deutschland GmbH</b> , Sydney Garden 9, 30539 Hannover, Deutschland

<b>GDPR – Competent supervisory authorities</b>	
<b>France</b>	CNIL - Commission Nationale de l'Informatique et des Libertés For more information: <a href="https://www.cnil.fr/fr/comprendre-vos-droits">https://www.cnil.fr/fr/comprendre-vos-droits</a>
<b>United Kingdom</b>	The Information Commissioner's Office. For more information: <a href="https://ico.org.uk">https://ico.org.uk</a>
<b>Nederland</b>	The Dutch Data Protection authority. For more information: <a href="https://www.autoriteitpersoonsgegevens.nl">https://www.autoriteitpersoonsgegevens.nl</a>
<b>België</b>	APD - <u>Autorité de protection des données / Gegevensbeschermingsautoriteit</u>

	For more information: <a href="https://www.autoriteprotectiondonnees.be/citoyen">https://www.autoriteprotectiondonnees.be/citoyen</a>
<b>Luxemburg</b>	CNPD – National Commission for Data Protection For more information: <a href="https://cnpd.public.lu/fr.html">https://cnpd.public.lu/fr.html</a>
<b>Australia</b>	Office of the Australian Information Commissioner. For more information: <a href="https://www.oaic.gov.au">https://www.oaic.gov.au</a>
<b>España</b>	Agencia Española de Protección de Datos AEPD For more information: <a href="https://www.aepd.es/">https://www.aepd.es/</a>
<b>Deutschland</b>	Bundesbeauftragter für den Datenschutz und die Informationsfreiheit (BfDI), <a href="http://www.bfdi.bund.de">www.bfdi.bund.de</a> . Zusätzlich zu der bundesweiten Aufsichtsbehörde gibt es in jedem Bundesland eine Landesdatenschutzbehörde. Die Kontaktdaten finden Sie auf der Webseite des BfDI
<b>Österreich</b>	Österreichische Datenschutzbehörde (DSB) hat ihren Sitz in Wien. Kontakt Daten der Behörde: Telefon: +43 1 52 152-0 und E-Mail: <a href="mailto:dsb@dsb.gv.at">dsb@dsb.gv.at</a> .