

Joint controller agreement - main points

Purpose

The purpose of the agreement is to set out the obligations of the joint controllers (Organisation et Développement – hereinafter “O&D” – and “Schools”) regarding personal data processing.

Definition of the respective roles of the joint controllers

O&D establishes and provides the Schools with the means and/or computing tools required for the latter to carry out their tasks that involve personal data processing and it oversees contractual relationships with sub-contractors. The Schools, in consultation with O&D, establish the purpose of processing operations and they process personal data of data subjects with the means provided by O&D.

O&D has appointed a Data Protection Officer who advises the Schools on any personal data processing matters.

Obligations of the joint controllers

The joint controllers shall reciprocally undertake to:

- process data in compliance with the applicable Regulation;
- guarantee the confidentiality of the personal data processed;
- make sure that the persons authorized to process personal data undertake to ensure data confidentiality and follow a required training program;
- take into account the principles of data protection by design and data protection by default regarding its tools, products, applications and services.

General principles of data protection

O&D shall provide the Schools with technical and legal means to ensure that data processing complies with the Regulation. The Schools shall undertake to process the data of persons concerned, only as part of jointly defined processing operations, and for the purpose(s) described in the agreement

Security measures

The joint controllers shall undertake to implement the technical and organizational security procedures required to ensure that data entrusted to them are not altered, deleted or accessible to non-authorized persons by applying the various security charters and policies established by O&D.

Information for data subjects

O&D shall maintain a general Confidentiality Policy and assist School in informing data subjects.

Information for joint controllers

The Schools shall notify O&D of any data breach and of any request from a competent authority or data subject. It shall be incumbent on the Data Protection Officer appointed by O&D to reply, with assistance from the Schools.

Data subjects' rights

Data subjects may exercise their rights with O&D and the Schools. It shall be incumbent on the Data Protection Officer appointed by O&D to reply to a data subject.

Enforcement of the agreement

The Data Protection Officer appointed by O&D ensures the effectiveness of the agreement via a series of checks.

Contact point for data subjects

The contact point is the Data Protection Officer appointed by O&D with the CNIL (French Data Protection Agency) (dpo@omneseducation.com).