

Legal Disclaimer
Blockchain document certification

1. Data Processing

You are requested to read the following information regarding the liabilities for personal data protection of the Early Makers Group LC and those of emlyon executive education, respectively the legal documents of **emlyon** business school (a private State-approved institution for technical higher education) located at 23 avenue Guy de Collongue, 69130 Ecully, France, acting as the authority responsible for personal data processing indicated herein-after.

2. End purposes

emlyon business school processes personal data for the following purposes:

- Editing and delivering diplomas and certificates relative to graduating students, notably under a dematerialized format;
- Provisioning diplomas and certificates of graduating students via a dedicated URL address;
- Managing, authenticating, recording, storing and safeguarding diplomas and certificates via the public Ethereum Blockchain and the Binance Smart Chain provided by the Binance Holdings Ltd. company;
- Third party authenticity control of diplomas and certificates using the dedicated URL address students may transfer.

3. Legal grounds

Personal data processing is carried out according to the legal grounds of the legitimate purposes of **emlyon** business school, being hereinafter:

- Delivering diplomas and certificates to students;
- Simplifying, automating, and reducing costs relative to delivering and storing of diplomas and certificates;
- Guarantying the authenticity of diplomas and certificates delivered by **emlyon** business school.

4. Mandatory obligations

The identification data we collect, as well as those collected subsequently (data required for establishing diplomas and/or certificates), are mandatory for the processing aforementioned. Consequently, failure to provide the requested data, or refusal to establish dematerialized diplomas, may jeopardize the dematerialized establishment and delivery of diplomas or certificates.

5. Data recipients

Your data may be transferred to the authorized departments of **emlyon** business school, our subcontractors, and all the persons you will have preliminarily shared with the URL address you are provided, allowing access to the diplomas or certificates.

These data may ultimately be communicated to all legal or administrative authorities requesting them, or who would need to have access to them (for instance, for controls or litigations).

Keep in mind that communicating your URL address is your decision only, and can only be carried out under your exclusive control and responsibility. Once the URL address is transferred to any third party, the latter will have access to your diplomas and/or certificates, and will in turn, be able to transfer this URL address to any other person.

Additionally, and for what it's worth, please note that your personal data are encrypted. In that respect, only encrypted data are recorded in the public blockchain Ethereum. Consequently, anybody having a copy of the public blockchain in particular, blockchain participants (operation node validators), will only be able to access encrypted data, so that they cannot access your personal data. The Binance Smart Chain does not host any of your personal data, it is operated for generic data hosting to serve the purposes described in chapter End Purposes.

6. Storage duration

Your personal data are recorded in the Ethereum blockchain, to be stored for the lifelong duration of this blockchain.

7. Data transfer

7.1 Data transfer outside the European Economic Area (EEA) to subcontractors of emlyon business school

Please note that your data may be transferred to recipients located in third party countries non-member of the European Union, with or without an equivalent protection policy, namely our subcontractors, notably in charge of hosting services, understanding that data transferring is governed by the following relevant guarantees:

- Trans border data flow conventions established in compliance with standard contractual terms between suppliers and subcontractors, and approved by the European Commission on February 5, 2010, number C(2010)593 and currently in force;
- Certification of subcontractors situated in the United-States in compliance with the Privacy Shield for EU data - USA and Switzerland - between the EU and the United-States currently in force, and its subsequent obligations.

You may request a detailed report of the guarantees implemented by sending an email to the following email address: blockchain@em-lyon.com

7.2 Data transfer outside of the EEA in the Ethereum blockchain and the Binance Smart Chain

You are thereby informed that the following may be located worldwide, in third party countries non-member of the European Union, with or without an equivalent protection policy, namely participants to the Ethereum blockchain (notably validation nodes operators), who may only access your encrypted data in their encrypted format (without being able to decrypt it).

7.3 Data transfer outside of the EEA via the URL address

Lastly, all recipients, be them inside or outside the European Union, to whom you would have transferred beforehand (for your personal activities) the URL address to access your diploma and/or certificates, will then be able to access your diploma or your certificates and the associated personal data. Such recipients will in turn be able to share the designated URL address with whom they choose to.

8. Your rights

In compliance with the legislation in force regarding personal data protection, you have the right to access, rectify and delete your information, to limit your data processing, and to your data portability (provided certain legal conditions are complied with).

You are also entitled to oppose at any given time, for reasons in keeping with your specific situation, the processing of your personal data based on the legal grounds of the legitimate interest of **emlyon** business school.

Exercising your right to delete your data, or your right to oppose to data processing shall cause your encryption key to be deleted. Your personal data recorded in the Ethereum blockchain will thereby be made undecryptable. This deletion shall be final and irreversible. Should you wish to access your diploma and/or certificates in blockchain again, in order to have access to a new URL address to be shared, you will have to proceed to a new registration of your data in blockchain.

Additionally, you have the right to indicate specific and general guidelines regarding the storing, deleting and sharing of your personal data after your death. General guidelines will have to be addressed to a third party who shall be designated by Decree.

Exercising your rights and post-mortem specific guidelines are to be sent by postal mail to the following address, **emlyon** business school / Délégué à la protection des données personnelles, 23 avenue Guy de Collongue, 69130 Ecully, France or by email to the following address, blockchain@em-lyon.com. You can prove your identity by any means. **emlyon** business school is entitled to request additional information deemed to be necessary, including the photocopy of your identity card or passport, should any doubt arise regarding the identity of the person concerned.

Should you wish to oppose to the accessibility of your diploma or certificates in blockchain, you may request so using the following email address: blockchain@em-lyon.com.

Should you deem that your rights on your personal data are not respected after having contacting us, you can send your claim to the *Commission Nationale Informatique et Libertés*.