

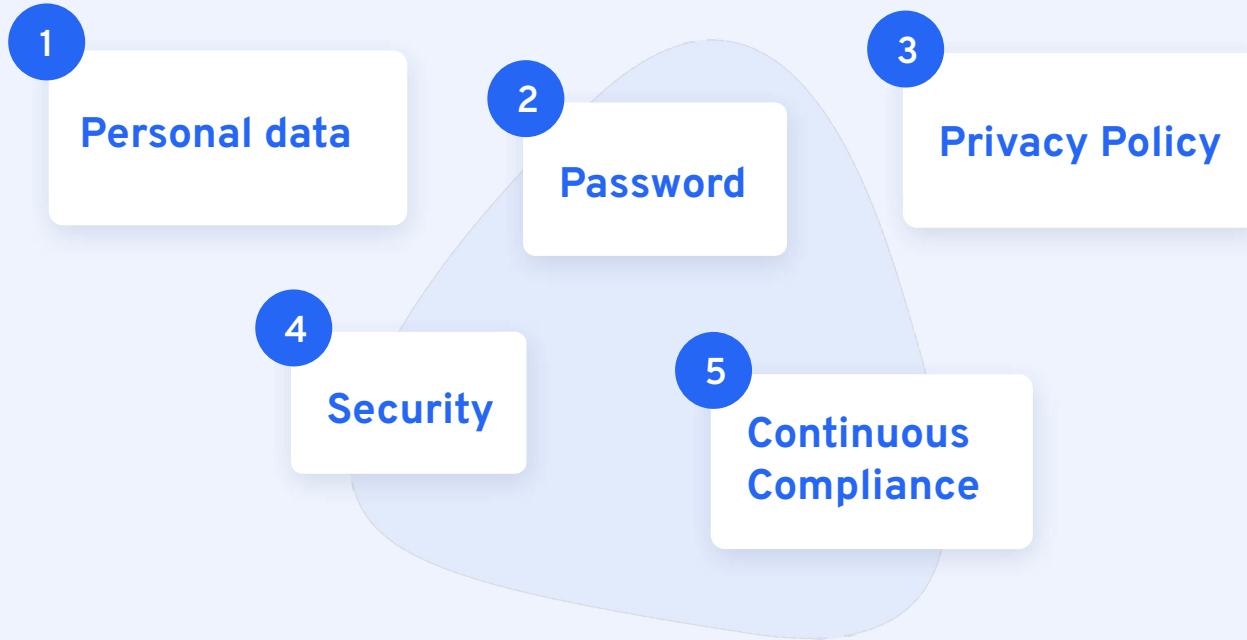


**360Learning**

Upskill from within.

GDPR Compliance

# Agenda



# 01

## Personal Data

Access - Modification - Removal



# What personal data is stored by 360learning?



## MANDATORY TO PROVIDE OUR SERVICE

- Name
- Lastname
- Email
- Password
- Learning data



## SUGGESTED FOR AN OPTIMISED USER EXPERIENCE

- Profile Picture
- Phone Number
- Biography
- Organisation
- Title / Role
- LinkedIn Profile
- Twitter Profile



## OPTIONAL USEFUL WHEN INTEGRATING WITH YOUR HR SYSTEMS

- **Labels**  
Labels are **keywords** attached to **users** to categorise them: country, region, Business Unit...
- **Additional Custom Information**  
This field is often used to store the **HR ID** (in case of integration with our API).

# Who can modify contact data?



## USERS IN THEIR OWN SETTINGS

- Name
- Surname
- Email
- Password using the reset password feature
- Profile Picture
- Phone Number
- Biography
- Organisation
- Title / Role
- LinkedIn Profile
- Twitter Profile

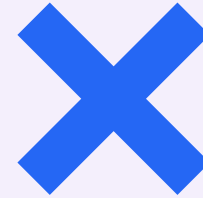


## ADMINS ON A USER'S PROFILE

- Email using the API
- Labels
- Additional Information



## 360LEARNING FOR SUPPORT ON THE PLATFORM



# Who can erase personal data?



## USERS IN THEIR OWN PROFILE

- Name
- Surname
- Profile Picture
- Phone Number
- Biography
- Organisation
- Title / Role
- LinkedIn Profile
- Twitter Profile

*NB: To deactivate or anonymise the account, a user must request it from the platform admin.*

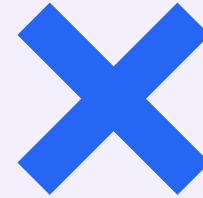


## ADMINS ON A USER'S PROFILE

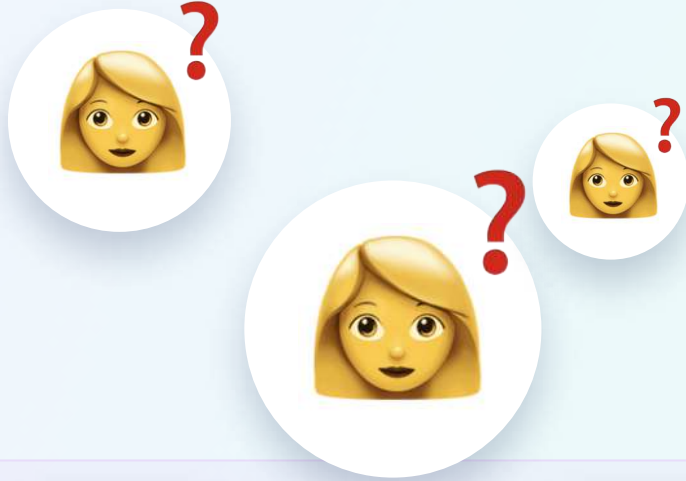
- An admin on the platform can remove a user's account. Once deactivated the user can no longer log in to the platform.
- An automatic deactivation date can be set upon account creation.



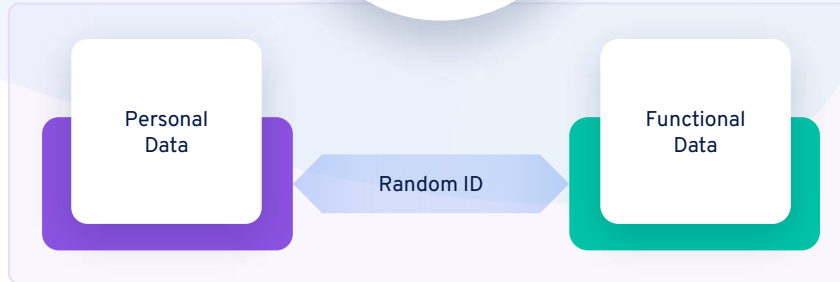
## 360LEARNING TO PROVIDE SERVICE



# Why pseudonymise personal data?



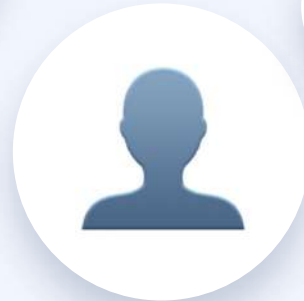
- Pseudonymisation prevents unauthorised 3rd parties from having access to a user's personal data.
- At 360Learning, personal data **are segregated in a unique collection inside our database**, and other functional data (learning content, statistics, groups,...) use a **random ID** to reference each user.



# Why anonymise personal data?

- Anonymisation allows you to keep historical and usage data of a “user” while no longer being able to identify it.
- At 360Learning, beyond user deactivation, you can anonymise its data. The following data will then be deleted from the user’s profile:

- Name
- Surname
- Email
- Hashed password
- Telephone
- Bio
- Organisation
- Title
- Additional Information
- LinkedIn
- Twitter
- Photo
  - *Profile*
  - *Cover*





# How is personal data stored?

## PROFILE INFORMATION

This is constantly read inside the database to be displayed on the platform. That is why it is stored un-encrypted on our servers. This enables **faster access and read time** which in turns greatly enhances the **platform's performances**.

## PASSWORD

- ✓ Passwords are hashed.
- ✓ We use the **Bcrypt** hash & a **random salt**. This process is repeated 10 times.
- ✓ This allows us to have a completely irreversible hash.

# 02

## Password

Creation - Restriction - Management



# How are password defined by users?



## USER

- ✓ Users choose their own password upon their **first connection** to the platform.
- ✓ It can be changed at any time. To do so, a button is available on a user's personal space. This will send an email to the user's email address to **reset** the password.



## ADMIN

- ✓ Administrators have the ability to **choose a temporary password** when creating a user account either via the web platform or with our API.
- ✓ This password **will have to be changed by the user the first time they connect.**

\*Except for users connected via SSO

# What restrictions can you implement?



When restrictions are activated on your platform, users' passwords must respect the following:

- Contain at least **8 characters**
- Contain at least **3 types of different characters:**
  - lowercase
  - uppercase
  - number
  - symbol

# How to choose a password?

## ✓ A sufficient length

Experts recommend choosing a passphrase rather than a password:

As such, `ILoveTrainingOn360LearningAndItsAwesome!` is far more secure than `36OL3arnin8;Fr`

## ✓ Nothing Personal

It is better to choose a password that isn't something close and personal : no birthday, children's name, pet name or similar.

## ✓ For Administrators, Change Passwords Often

Ideally, these passwords should be changed **every 3 months**.



# How to manage your passwords?



**1Password**

- To prevent a snowball effect, each of your online accounts should be locked with a **unique password**.
- To facilitate in this 360Learning uses **1Password**, a password manager that generates and manages all a user's passwords.
- Afterwards, all you need is **one unique Master password**, and 1Password takes care of the rest.

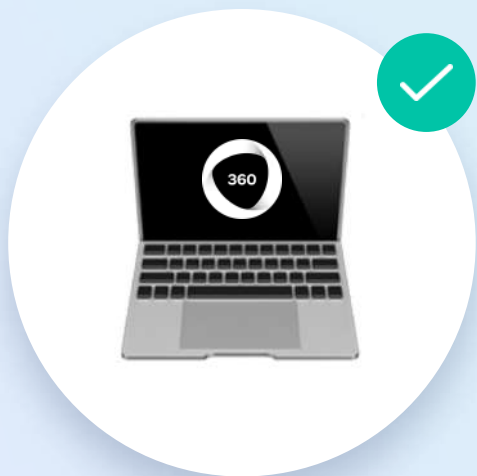
# 03

## Privacy Policy

Clients - Users



# How is consent obtained from the user?

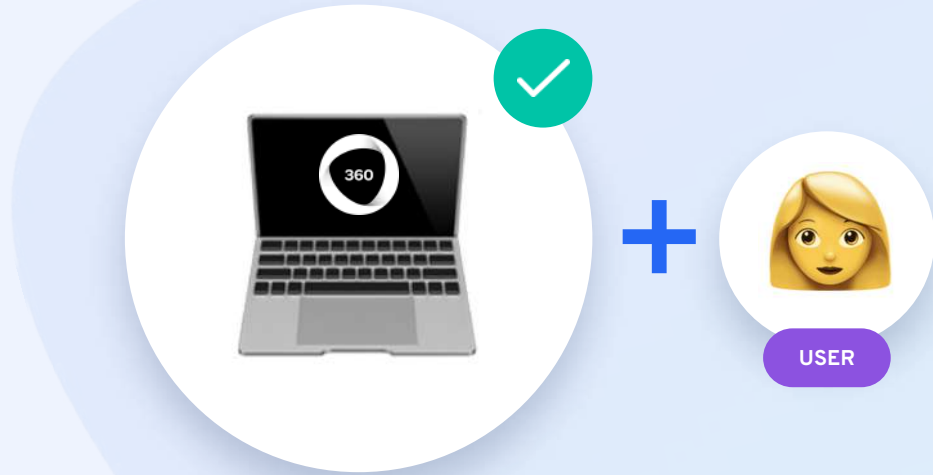


- ✓ As a Data Processor, 360Learning is not responsible for the privacy policies of its clients.
- [Our Data Protection Agreement](#) deals with the personal data aspects of our contractual relationship and defines the responsibilities for both 360Learning and its customers.
- As such, the customer can **inform its users** (or collect the consent of its users) by adding its **privacy policy** before using our services.
- We offer to help the customer in this by activating a **tick-box upon first connection**, if the client wishes to collect the consent of its users.



# Each user can find the privacy policy in its profile

- ✓ Customers can add the link to its own privacy policy to the platform and can make it accessible to all users.
- ✓ It can be found in the **My settings** section of your profile.



# 04

## Security

Software - Physical



# With 360Learning, your data is available, safe and yours

## ACCESS PROTOCOL

- Access is systematically forced in **HTTPS**



## ENCRYPTION

- All passwords are encrypted (**BCRYPT**)

LOGIN

## FIREWALL AND PORT FILTERING

- Only the ports necessary to platform functioning and administration are authorized. If an attack is detected, clients are notified **within 24 hours**



# IP

## IP CONTROLS

- To limit external platform access, you can filter **IP addresses**

360

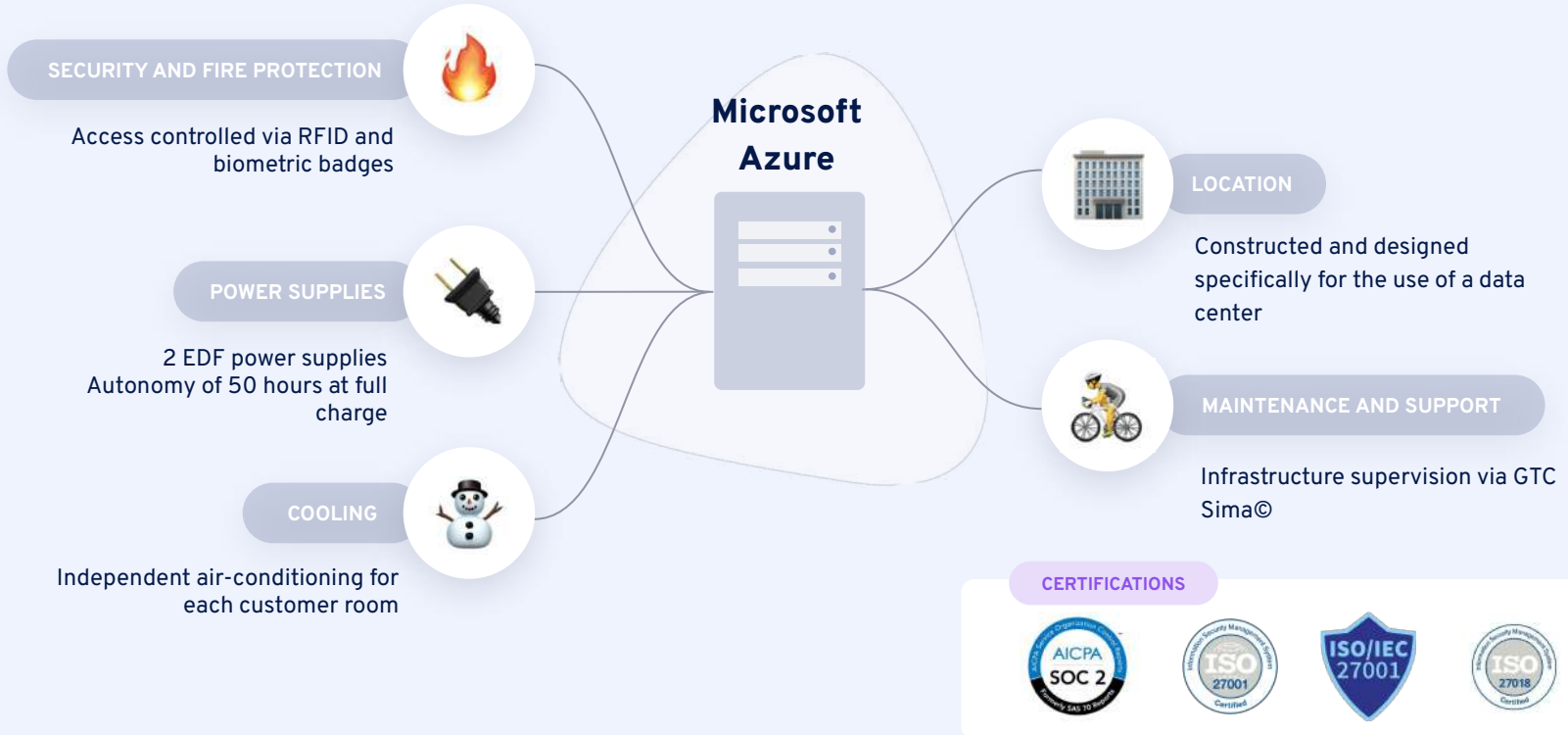
# With 360Learning, your data is available, safe and yours

Microsoft Azure

360Learning's main infrastructure is hosted in the data centers of our partner, **Microsoft Azure**, in **France** 🇫🇷



# With 360Learning, your data is available, safe and yours



# 05

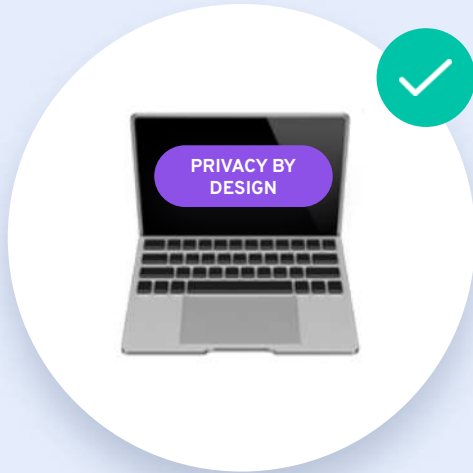
## Overview of Our Compliance Measures

360Learning Platform



# “Privacy by Design”

## The Functionalities



- Information of your **Users** by adding your Privacy Policy
- The possibility to activate a checkbox to collect **consent**,
- The control by the Users of their personal data (access, rectification)
- The possibility to **anonymize** Users

# The Tools of Our Compliance

- ✓ Up-to-date contracts, in line with the **GDPR**
- ✓ A Data Processing Register
- ✓ A [Privacy Policy](#)
- ✓ A dedicated “**Data Protection Team**” led by our Data protection Officer (DPO), that can be contacted at [data-protection@360learning.com](mailto:data-protection@360learning.com)
- ✓ Specific **employee training** in relation to data protection subjects
- ✓ Internal governance and procedures (*exercise of rights granted by the GDPR, handling security incidents*).
- ✓ A [General Data Protection Policy](#)
- ✓ Technical [Documentation](#) that lays out our security measures
- ✓ A [DPA](#) based on the European Commission's Standard Clauses.
- ✓ A security incident register





**#thankyou**

