

## **PRIVACY POLICY AND COOKIES**

### **Preamble:**

When you visit the website <https://spineway.academy/fr/> (hereinafter "**Spineway Academy**"), Spineway, a public limited company located at 7 allée du Moulin Berger, 69130 Ecully (France), processes your data as the data controller (hereinafter "**Spineway**").

Spineway attaches particular importance to respecting your privacy and protecting your data and, in this context, undertakes to comply with Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data (known as the "GDPR") and Law 78/17 of 6 January 1978 on information technology, files and freedoms (known as the "Data Protection Act" or "LIL") (hereinafter referred to as **the "Regulations"**).

Below you will find all the information you need about how your data is processed and used, as well as your rights.

### **General information:**

In general, Spineway Academy has been designed to comply with the principle of data minimisation.

Access to Spineway Academy is reserved for users with a personal account.

To create an account, users must complete a registration form and provide certain information, including a valid email address.

A verification email is then sent to confirm the email address provided.

Because your personal data is processed when you use Spineway Academy, you will find the details below concerning:

- how and for what purposes Spineway uses and stores your personal data;
- the legal basis on which your personal data is processed;
- the categories of recipients of your personal data;
- your rights and our obligations in relation to this processing.

### **What personal data is processed and for what purposes?**

<b>Personal data processed</b>	<b>Purpose(s) of processing</b>	<b>Legal basis for processing</b>
Email address*, surname*, first name*, title*, password*, profession, town/city*, country*	Management of account creation requests.	Spineway has a legitimate interest in processing your data in order to process your request and contact you.
Email address	Sending emails related to your speciality	Spineway asks for your consent when you create your account

Email address*, any other information you enter in the email you send us via the "Contact" tab	Management of contact requests sent to spinewayacademy@spineway.com	Spineway has a legitimate interest in processing your data in order to be able to process your request and contact you.
Address email address*, surname*, first name*, profession*, any other information you enter in the "message" field	Management of contact requests via the contact form	Spineway has a legitimate interest in processing your data in order to process your request and contact you.
Surname*, first name*, company*, telephone number*, email address*, country* of the person making the request.  Surname*, first name*, country*, name of healthcare establishment*, email address*, telephone number* of surgeons to be trained	Management of operating theatre training requests	Spineway has a legitimate interest in processing your data in order to process your request and contact you.
IP addresses, browser used, language, operating system, device information (including device categories and characteristics), referring web page, pages visited, location (city) and other cookie information. (depending on the permissions you have granted us)	Website management and audience measurement	Spineway has a legitimate interest in processing your data in order to enable you to access the Website under the best possible conditions and to compile audience statistics when you have given us your consent.
Surname*, first name*, email address*	Management of rights requests	Spineway has a legal obligation to manage users' rights over their personal data

\*: mandatory data, essential for processing to be carried out and the purpose to be achieved.

#### To which categories of recipients are your personal data transmitted?

Your personal data may be transmitted to the categories of recipients listed below:

- Internally to departments authorised to manage the website and process your various requests.
- To third-party service providers, acting as processors, who provide support for internal operations and assist Spineway in managing them.  
These service providers, acting as subcontractors, may only process your personal data for the purposes authorised by Spineway and under conditions that ensure confidentiality and security in accordance with the Regulations.

The recipients referred to above are the only recipients of your personal data. In any event, Spineway strictly refrains from renting or selling your personal data.

In all cases, Spineway makes every effort to ensure the confidentiality and security of personal data when it is transmitted to the aforementioned categories of recipients.

## How long are your personal data kept?

In principle, your personal data is kept for the period necessary to fulfil the main purpose referred to above.

Your personal data may also be retained for legal purposes and to assert Spineway's rights and interests until the expiry of the applicable limitation period.

The retention period for your data is therefore variable and determined on the basis of the following two criteria:

- the purpose for which it is used: Spineway must retain the data for the period necessary to fulfil the purpose related to the processing; and
- legal obligations: legislation or regulations may set a minimum period during which Spineway must retain personal data.

At the end of this period, your personal data is destroyed or anonymised. Anonymisation ensures that personal data can no longer be associated with the data subject.

Finally, you may request the deletion of your data at any time. If such deletion is permitted by the regulations in force, Spineway will permanently delete your data within thirty (30) days of your request.

## What rights do you have over your data?

Your rights are listed below.

These rights can be exercised by emailing [dpo@spineway.com](mailto:dpo@spineway.com) or by writing to the following address: Spineway, 7 allée du Moulin Berger, 69130 Ecully (France).

**Your right to access and rectify your data:** you have the right to access and rectify your personal data.

**Your right to erasure of your data:** you may ask us to erase your personal data in the cases provided for by the Regulations.

**Your right to restrict data processing:** you may request that the processing of your personal data be restricted in the cases provided for by the Regulations.

**Your right to object to data processing:** You have the right to object to the processing of your personal data in the cases provided for by the Regulations.

**Your right to data portability:** you have the right to the portability of your personal data in the cases provided for by the Regulations.

**Your right to withdraw your consent:** when the data processing carried out by Spineway is based on your consent, you may withdraw it at any time. Spineway will then cease to process your personal data without calling into question the previous operations for which you had given your consent.

If you believe that Spineway has not respected these rights, you have the right to appeal. You may lodge a complaint with the French Data Protection Authority (CNIL) - <https://www.cnil.fr/fr/cnil-direct/question/adresser-une-reclamation-plainte-la-cnil-quelles-conditions-et-comment>

## How is your data protected?

Spineway is committed to ensuring the security of your personal data and takes all necessary measures (physical, technical, administrative and organisational) to ensure the security and confidentiality of your data and to prevent its loss, alteration, destruction or use by unauthorised third parties.

In addition, we require our service providers and subcontractors who may have access to your personal data to implement appropriate technical and organisational security measures with regard to this personal data.

### What is the cookie policy?

On Spineway Academy, information is collected and stored using browser cookies or similar tools.

A cookie is a small text file placed and stored on your device, which records certain settings and data for interaction with our system from your browser.

A cookie usually contains the name of the domain from which the data originates, information about the date of its creation and an alphanumeric identification code.

You can configure cookies at any time:

- on the Login page; or
- via the "cookie preferences" link at the bottom of the Spineway Academy page.

Below is a list of the cookies used on Spineway Academy.

→ Necessary cookies

These cookies are necessary for Spineway Academy to function properly. They are used to optimise and simplify your user experience.

These cookies do not require your prior consent and cannot be disabled, as without them, Spineway Academy cannot function properly.

Cookie name	Purpose	Default expiry time
PHP session cookie	Ensure the website functions properly and maintain the user session	Deleted when the browser is closed

→ Functional cookies

These cookies are necessary for Spineway Academy to function properly. They are used to optimise and simplify your user experience. These cookies are used to remember the choices you make when using Spineway Academy.

For example, we may use functional cookies to remember your login .

Cookie name	Purpose	Default expiry time
Authentication cookie	Maintain the connection of the authenticated user	1 year

→ Third-party cookies

The Website also uses the following third-party cookies:

Cookie name	Purpose	Default expiry time
Performance cookies		
Footprint analytics		14 months

	Analyse user behaviour and generate statistics	
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→ Third-party tools:

Spineway Academy uses the following third-party tools:

#### **Microsoft Forms**

We use Microsoft Forms to create and manage online forms (e.g. questionnaires, registrations). When you fill out a form, Microsoft may process certain data (answers, technical connection information) to ensure the secure recording and transmission of responses.

For more information, please refer to Microsoft's privacy policy.

#### **reCaptcha**

We use Google reCAPTCHA to protect Spineway Academy from abuse and automated submissions (spam). This tool verifies that certain actions are performed by a human and not by a robot.

When using reCAPTCHA, certain data (such as IP address, browsing behaviour, mouse movements, etc.) may be collected by Google. This data is subject to Google's privacy policy.

For more information, please refer to Google's privacy policy: <https://policies.google.com/privacy>

And the terms of use: <https://policies.google.com/terms>

#### **Vimeo**

Spineway Academy uses third-party services provided by Vimeo (to host and stream videos on our website). When playing a video, Vimeo may collect certain technical data (e.g. IP address, browsing data, cookies) necessary for the video player to function and for audience measurement.

For more information, please see Vimeo's privacy policy.

#### **jsDelivr**

We use jsDelivr, a content delivery network (CDN), to load and distribute certain JavaScript libraries and technical resources necessary for the proper functioning of the site more quickly.

During this loading process, jsDelivr may collect technical data such as IP address, browser type or connection information, solely for the purposes of performance, security and service reliability.

For more information, please see jsDelivr's privacy policy.

### **Changes to the privacy policy**

Spineway reserves the right to modify the privacy policy at any time.

Any changes will be posted directly on this page. To ensure that you have the latest version, Spineway invites you to check this page regularly.

Last updated: 12 March 2026.