Habilitatem

Privacy Policy

Last updated: 29 June 2026

1. Purpose

This Privacy Policy describes how Habilitatem collects, uses, stores and protects the personal data of users of its website and competency management platform.

Habilitatem is committed to processing personal data in accordance with Regulation (EU) 2016/679 of 27 April 2016 (the "GDPR") and the amended French Data Protection Act.

This Policy supplements the Terms and Conditions of Use available on the website.

2. Data Controller

For processing related to the operation of the website, user account management and business relationships, the data controller is:

Habilitatem

Address: 22 Square Alboni, 75016 Paris

SIREN: 890493943

Email: contact@habilitatem.com

Where the platform is used by a company, university or any other client organisation to manage the competencies of its employees or students, Habilitatem generally acts as a data processor within the meaning of Article 28 of the GDPR. The client organisation remains the data controller for processing carried out for its own HR or educational purposes.

3. Personal Data Collected

Depending on your use of the website or platform, Habilitatem may process the following categories of personal data:

Identification data

- First and last name
- Email address
- Job title or status
- Company, institution or affiliated organization

Account data

- User ID
- Connection link (sent by email)
- Login history
- IP address
- Browser and device information

Competency-related data

- Declared competencies
- Self-assessments
- Manager or assessor evaluations

- Assessment results
- Competency passports
- Development plans
- Training records
- Certifications
- Professional objectives
- Evaluation comments

Technical data

To ensure the proper operation and security of the platform, certain technical information may be recorded, including access and usage logs.

Habilitatem does not intentionally collect special categories of personal data within the meaning of Article 9 of the GDPR unless expressly requested by the client and permitted by applicable law.

4. Purposes of Processing

- Create and manage user accounts
- Enable use of the platform
- Manage competency passports
- Conduct assessments and self-assessments
- Produce dashboards and indicators
- Monitor competency development pathways
- Provide user support
- Ensure information system security
- Improve service quality
- Comply with legal and regulatory obligations

5. Legal Bases

- Performance of the contract concluded with the client organization
- Habilitatem's legitimate interest in ensuring the security, maintenance and improvement of its services
- Compliance with legal obligations
- The user's consent where required by law

6. Recipients of the Data

- Client organisation administrators
- HR or academic managers designated by the client
- Authorised managers or assessors
- Habilitatem staff responsible for technical support, maintenance and security
- Technical service providers involved in hosting or maintaining the platform under confidentiality obligations

Personal data is never sold to third parties.

7. Data Retention

Personal data is retained only for the period necessary to achieve the purposes for which it was collected, in accordance with the data storage limitation principle set out in the GDPR.

Where Habilitatem acts as a data processor, the applicable data retention periods are determined by the client organisation acting as the data controller, in accordance with its legal and contractual obligations.

Technical logs and security-related data are retained for a period proportionate to the requirements of information systems security and any applicable legal obligations.

At the end of the applicable retention periods, personal data is securely deleted or irreversibly anonymised, unless its continued retention is required by law or regulation.

Where Habilitatem acts as the data controller, personal data is retained for a maximum period of five (5) years from the date on which the data subject leaves the client organisation (company, higher education institution, training provider, or any other partner organisation), unless an earlier deletion request is validly exercised or a different retention period is required by applicable law.

8. Data Security

Habilitatem implements appropriate technical and organisational measures to ensure the confidentiality, integrity and availability of personal data.

- Encrypted communications
- Access rights management
- User authentication
- Access logging
- Regular backups
- Security procedures adapted to identified risks

9. Data Transfers

As a general rule, personal data is hosted and processed within the European Union.

Where processing requires transfers to a third country, Habilitatem ensures that such transfers are carried out in accordance with the GDPR, including through adequacy decisions or Standard Contractual Clauses approved by the European Commission.

10. Your Rights

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to object
- Right to data portability where applicable
- Right to withdraw consent where processing is based on consent

Where Habilitatem acts as a data processor, requests concerning these rights should primarily be addressed to the organisation that created the user account. Habilitatem will assist that organisation in accordance with its contractual and legal obligations.

Requests may also be sent to:

contact@habilitatem.com

A response will be provided within the time limits required by applicable law.

11. Complaints

If you believe that your rights have not been respected, you may lodge a complaint with the competent supervisory authority.

For processing subject to French law, the competent authority is the French Data Protection Authority (CNIL).

12. Cookies

The Habilitatem website uses cookies and other trackers necessary for its operation.

Where non-essential cookies are used (analytics, user experience improvement or third-party services), they are only placed after your consent has been obtained in accordance with applicable regulations.

You may change your cookie preferences at any time via the consent management tool available on the website.

13. Changes to this Policy

Habilitatem reserves the right to amend this Privacy Policy to reflect legal, regulatory or technical developments.

The version in force is the one published on the website on the date of consultation.