

BELOW THE LINE TRAINING & DEVELOPMENT LIMITED PRIVACY STATEMENT

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the EU General Data Protection Regulation (the "GDPR").

2. Who are we?

Below the Line Training & Development Limited is the data controller (contact details below). This means it determines how your personal data is processed and for what purposes.

3. How do we process your data?

Below the Line Training & Development Limited complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use personal data for the following purposes: -

- To provide effective training and educational programmes to our clients
- To inform our clients of any news, events, opportunities or developments at Below the Line Training & Development Limited.

4. What is the legal basis for processing your personal data?

Depending on our relationship with you (e.g. clients, prospective clients, suppliers etc.), we maintain personal data on the legal basis of our legal obligations, contractual requirements or the legitimate business interests of Below the Line Training & Development Limited.

5. Sharing your personal data

In certain circumstance, we need to share personal data in compliance with legal requirements (for example with selected service providers to enable payments). If you agree, Below the Line Training & Development will share your data with trusted secure third parties who help us to conduct our business.

6. International Transfer

All personal data is stored within the European Economic Area or countries that have been designated as adequate by the European Commission. We will not transfer any data to a third country or international organisation without your explicit consent and without appropriate privacy safeguards in place.

7. How long do we keep your data?

We keep data in accordance with the guidance set out within our formal records retention policies and our legal obligations. We do not maintain data beyond what is absolutely required.

8. Your rights and your personal data

You have the following rights with respect to your personal data: -

- The right to request a copy of your personal data that Below the Line Training & Development Limited holds about you.
- The right to request that Below the Line Training & Development corrects any personal data if it is found to be inaccurate, incomplete or out-of-date.
- The right to request your personal data is erased where it is no longer necessary or lawful for Below the Line Training & Development Limited to retain such data.
- If we have required your consent to process data, you have the right to withdraw your consent to the processing at any time.
- The right to request that Below the Line Training & Development Limited provide you with a copy of your personal data and, in certain circumstances, to transmit that data directly to another data controller.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data, where:
 - Below the Line Training & Development Limited relies on legitimate interests as the legal basis for processing.
 - Below the Line Training & Development Limited is using the data for direct marketing.
 - Below the Line Training & Development Limited is processing data for the purposes of scientific/historical research and statistics.
- The right to lodge a complaint with the Supervisory Authority. As our main establishment is based in Ireland, the first point of contact should be Data Protection Commission (Ireland) – see details below.

9. Changes to our Privacy Statement

Below the Line Training & Development keeps its Privacy Statement under regular review and will place any updates on its website. This Privacy Statement was updated in June 2019.

10. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Below the Line Training & Development Limited Data Privacy Representative at the following location.

hello@belowtheline.ie

11. Complaints

You can contact the Data Protection Commission (Ireland) at the following location:

Data Protection Commission, Canal House, Station Road, Portarlington, Co. Laois, R32 AP23, Ireland.

Phone +353 (0761) 104 800 LoCall 1890 25 22 31
Fax +353 57 868 4757 email info@dataprotection.ie