

Privacy Notice - Clients, Participants and Delegates (Controller) (Europe)

1. What is the purpose of this document?

Roffey Park is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us.

Roffey Park Institute Ireland CLG is a "data controller". This means that we are responsible for processing personal information about you in order to provide the services we have either contracted with you directly to provide or via a contract with your employer. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and previous clients, participants and delegates. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person could be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

Depending on your relationship with us we may collect, store, and use the following personal information about you:

- Name.
- Date of birth.
- Personal contact details - address, email, telephone number and mobile number.
- Work contact details - address, email, telephone number and mobile number.

- Job title.
- CCTV footage and other information obtained through electronic means.
- Information about your use of our information and communications systems if you access our LRC Knowledge Base or use LRC computers and or Moodle platform.
- Photographs and videos.
- Credit card details.
- Car registration.
- Passport details.

We will also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your gender, nationality, race or ethnicity, religious beliefs and sexual orientation for equal opportunities monitoring.
- Information about any specific dietary requirements you tell us about.

4. How is your personal information collected?

We collect personal information about clients, participants and delegates through our contract with you or your employer to provide services to you. Much of the information we collect will be provided by you directly or via your employer who has contracted with us to provide services.

We will collect additional personal information in the course providing services to you as a client, participant or delegate.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

6. Situations in which we will use your personal information

We need some or all the categories of information in the list in paragraph 3 primarily to allow us to perform our contract with you or your employer, and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests **and** fundamental rights do not override those interests. The situations in which we may process your personal information are as follows:

- Determining the terms on which we contract and provide services to you.
- Managing our relationship with you or your employer (including to communicate with you or your employer, provide services, and to create documentation produced during the relationship between us and you such as joining instructions, sign-in sheets, attendance sheets and name badges).
- To ensure that we keep up-to-date records about you e.g. contact details.
- Administering the contract we have entered into with you or your employer (including accounting and auditing and any business continuity and disaster recovery planning).

- Storing a copy of a client contract.
- For agreed marketing collateral.
- Equal opportunities monitoring for some Qualifications.
- Making a decision about your selection to join a Qualification programme from your application form.
- Taking up references for some Qualification programmes.
- Providing certificates for Qualifications.
- Maintaining pass lists for Qualifications.
- Storing a copy of a dissertation.
- Producing documents as a result of you completing online tools such as a 360 report and or psychometrics.
- Participation in surveys.
- Participation in an audio recordings or transcripts.
- Event evaluation and feedback forms.
- Membership of our LRC giving access to LRC Knowledge Base and use of LRC computers onsite.
- Record of books loaned from our LRC by members.
- Access to our Moodle platform where available.
- Accommodation registration cards for onsite clients, participants or delegates.
- For onsite residential international clients, participants or delegates, passport details.
- Credit card details to process payment.
- Car registration for onsite security.
- Letters of attendance to enable a client or participant to obtain a visa to attend a programme.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

7. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or your employer (such as providing services to you), or we may be prevented from complying with our legal obligations (such as to auditing of invoices).

8. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or perform our contract with you and in line with our data protection policy.

- Where it is needed in the public interest, such as for equal opportunities monitoring in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about current and previous clients, participants and delegates in the course of legitimate business activities with the appropriate safeguards.

Our obligations as a company

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to specific dietary requirements so that we can meet your needs if you are attending a programme or event at our residential site.
- For some Accredited Qualifications we will use information about your gender, race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. Such data is collated and anonymised.

Do we need your consent?

Yes, we need your explicit consent to process this sensitive personal information in these ways. Such consent will be sought from you in our joining instructions.

10. Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

11. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to provide the services we have contracted with you or your employer to undertake or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. Activities which may be carried out by the following third-party service providers: IT services, 360 reporting or psychometric online tool providers and/or the University of Sussex, UK.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of providing services which may involve completion of 360 reporting or psychometric online tools, using our LRC Knowledge Base and or Moodle platform, or administering a Qualification accredited by University of Sussex. We may also need to share your personal information with a regulator or to otherwise comply with the law.

12. International transfers

We may transfer your personal information to various jurisdictions to perform our obligations under this privacy notice and related agreements. The applicable data protection laws of those jurisdictions may differ from the data protection laws of your country and, in some cases, may not be as protective. Whenever we transfer your personal information outside your country of residence, we will ensure a similar degree of protection is afforded to it as the data protection laws of your country.

13. Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, freelancers and contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

14. How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements or for the duration of our contract with you or your employer. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we consider you are no longer a client, participant or delegate we will retain and securely destroy your personal information in accordance with applicable laws and regulations. We retain participant and delegate names attending programmes and events for a period of 5 years in case of a request to verify attendance after which your personal information will be deleted. Name, pass date and Accredited Qualifications obtained are held by us on an ongoing basis in order to verify requests that a qualification was obtained by you.

15. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please email dataprotection@roffeypark.com.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dataprotection@roffeypark.com. Once we have received notification that you have withdrawn your consent and have assessed you do have a right to withdraw your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Complaints

You have the right to make a complaint at any time to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details can be found at www.dataprotection.ie. We would, however,

appreciate the chance to deal with your concerns before you approach a data protection authority so please contact us at dataprotection@roffeypark.com in the first instance.

16. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This notice may have been shared with you directly by us or via a Client Contact who has contracted Roffey Park to provide services.

By participating in a service Roffey Park is providing, you acknowledge that you have received a copy of Roffey Park's Privacy Notice for Clients, Participants and Delegates (Controller) and have read and understood it.

If you have any questions about this privacy notice, please email dataprotection@roffeypark.com