

## Privacy Policy

### Policy Statement

This Privacy Policy sets out how Prosci's European group of companies ("we", "us") collects, uses, stores, shares and protects personal data that users ("you") provide, or that we collect from you in the course of our business activities. We are committed to being fair and transparent with you about how we handle your personal data, ensuring that your privacy is protected and appropriately managed in line with applicable data protection legislation. This Privacy Policy also describes your rights and choices regarding our use of your personal information.

Please read this Privacy Policy carefully as it contains important information about who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data and how to contact us.

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This Privacy Policy may be updated from time to time. Please check this page to ensure you are happy with any changes we make.

**Contact Details** - if you have any questions or queries regarding your personal data and/or our processes, please contact our Data Protection Officer either by:

- Email: [dpo.europe@prosci.com](mailto:dpo.europe@prosci.com)
- Phone: +44(0)1600 740215; or +45(0)2637 6769
- Post: address to EU Data Protection Officer at Højbro Pl. 10 1200, Copenhagen, Denmark
- Post: address to UK Data Protection Officer at 2 Two Kingdom Street, 6th Floor, Paddington, London, W2 6BD.

## The Policy

### 1. Who we are

This Policy applies for Prosci's European group of companies, registered and/or operating in the United Kingdom, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg, Morocco, Netherlands, Norway, Portugal, South Africa, Spain, Sweden, Switzerland and the UK. Details of our registered companies and locations can be found on our [website](#).

We collect, process, store, disclose and protect personal information (information by which an individual can be identified) to perform our business activities and to primarily provide change management consultancy, training and coaching services, together with the recruitment and selection of staff, suppliers and products required to deliver those services to you (the "Services"). Automated decision making or profiling is not carried out by us.

By providing your personal information to us, you agree that this Privacy Policy will apply to how we handle your personal information, and you consent to us collecting, processing, storing and disclosing your personal information as detailed in this Privacy Policy (please see section 2 of this Privacy Policy for our lawful grounds to do so which includes consent to us using and disclosing your personal information for the purpose for which it was collected, unless you withdraw your consent).

If you do not agree with any part of this Privacy Policy you must not provide your personal information, or the personal information of third parties to us. Please note if you do not provide us with your personal information, or if you withdraw the original consent you provided under this Privacy Policy, this may affect our ability to provide Services to you, or negatively impact the Services we provide to you.

### 2. Personal data and the law

Personal information is defined as any information which is related to an identified or identifiable natural person. There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Privacy Policy.

This Privacy Policy outlines our information handling practices and managing your privacy in compliance with the Data Protection Act 2018, UK General Data Protection Regulations (UK GDPR), the International Data Transfer Agreement for the international transfer of personal data, issued under section 119A Data Protection Act 2018, and operative from 21 March 2022 (the "IDTA"), EU GDPR ((EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) as applicable and in force across the European Union, Law No 09-08 as implemented in Decree n° 2-09-165 of May 21, 2009 applicable in Morocco and The Protection of Personal Information Act 4 of 2013 (POPIA) as applied in South Africa, including any amendment, update, modification or re-enactment of such laws. The legal requirements directly applicable to the Services shall be deemed in effect by all parties involved in the Services and form part of this Privacy Policy (unless otherwise agreed in writing).

When handling your data, we rely on one or more lawful grounds to process your personal information. We will only process your personal information on one of more of the following lawful grounds:

- **Specific consent** - you have given your consent to such processing by voluntarily providing us with your personal information. You can withdraw your consent at any time but that may preclude you from using our Services thereafter.

- **Performance of a contract** - the processing is necessary to provide our Services to you.
- **Legal obligation** - the processing is necessary for compliance with our legal obligations.
- **Legitimate interest** - where it is reasonably necessary to achieve our or third parties' legitimate interests.

### 3. Personal data we collect from you

We typically collect, process and store the following types of personal information you provide to us:

- Full name
- Email
- Postal address (if applicable)
- Phone number
- Job title

In addition to the above, we also collect, process and store the following types of personal information depending on your relationship with us:

- For in-person training - dietary requirements, special requests, health/mobility issues (if any) and/or customer service interaction notes
- For virtual training - any special requests, health issues (if any) and/or customer service interaction notes
- For job applications - CV's and applications
- For successful job applications - third party pre-employment due diligence checks, employment verification information including criminal record checks, third party references, professional or educational certifications/licenses etc.
- For employees - date of birth, gender, any personal details, or health information that you choose to share with us, learning and development records (including certifications), identification documents, right to work verification documents, any additional information to support your employment with us, provision of benefits and third-party emergency contact details.

When you provide personal information on behalf of a third party e.g., providing emergency or referee contact details you agree that you have obtained the consent of the other person (the third party) for us to collect, use and disclose their personal information in accordance with this Privacy Policy, and that you have made the third party aware of your actions and of this Privacy Policy.

### 4. How we collect your personal data

You may choose to share your personal data with us by various means which may include but not be limited to making an online enquiry or by purchasing our Services through our website(s), or by attending one of our courses or workshops, visiting our website(s) through cookies, by sending us an email, by completing a survey, through a third party website for job applications, from third parties as your nominated referee, or by providing your details by letter or telephone, or by completing an internal form to support your employment or contractual status with us. This may include subscribing to any of our Services, requesting newsletters, obtaining downloads, registering for

events and online webinars, contacting us through social media channels, accounting and administration (business to business) or applying for an opportunity. You may choose not to provide your personal information that we request through the Services. However, not providing the information we request may restrict your ability to use certain features of the Services.

## 5. How we use your personal data

We use the personal data provided by you to provide our Services, fulfil your requests, improve our Services, engage in research and analysis relating to the Services we provide, personalise your experience, track usage of the Services, provide feedback to third parties that are listed on the Services, display relevant advertising, market our Services, provide customer support, contact you, for recruitment, back up our systems, allow for disaster recovery and to enhance the security of the Services.

We will store your contact data so we can provide you with information in regard to our products and Services that you may be legitimately interested in. We may also contact you to ask you to complete surveys that we use for research purposes (responding at your discretion), You have the option to unsubscribe from these communications at any time.

## 6. Who we share your personal data with

We share your personal data with your consent, as necessary to complete any transaction or provide any product or Service you have requested or authorized and where we have a legal basis to do so (see clause 2). This includes sharing your personal data with our sub-processors, our subsidiaries, and when we are legally bound to do so by law.

We may disclose some or all of your personal information to:

- Any member of our organisation or group, including employees of our global subsidiaries outlined in the above Policy Statement,
- Other third-party contractors and suppliers including but not restricted to benefit providers, travel providers, IT service providers and data hosting providers, parties supporting remote working on customer sites, our banks and external business advisors, such as lawyers, accountants and auditors.

Please be assured that our sub-processors have contractual agreements in place incorporating data protection provisions as required by law. Our list of **sub-processors** is available to view [here](#). In the event of sale, merger, de-merger, acquisition or other reorganisation of the businesses, your personal data will be shared and processed in accordance with our legitimate interests and those of relevant third parties. In all cases data sharing will only take place when appropriate contracts, including confidentiality and/or data transfer obligations (where required) are completed with the planned recipient(s) of your data.

We will disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use, or to protect the rights, property, or safety of our companies, our customers, or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction, or to comply with UK Government or EU regulations.

## 7. Where your personal data is stored

The personal data that we collect from you is stored in professional datacentres within the Economic European Area, United Kingdom and/or the United States of America (USA).

Your personal data may be transferred and stored in the USA, and managed by sub-processors who support us in carrying out our Services to you. Employee and contractor personal data may be shared with third parties and transferred to their storage and sub-processing destinations to support customer delivery arrangements including business travel, etc. Our list of sub-processors is available to view (please see clause 6).

## **8. How long we keep your personal data**

If you contact us, we may keep a record of that correspondence. We may retain details of your visits to our website(s) including, but not limited to, traffic data, location data, weblogs and other communication data and a record of the resources you access.

We may keep a record of your website preferences and interests, other information relevant to customer surveys, offers made by us and details of the transactions you complete through the website and the fulfilment of your orders.

Data is retained for a maximum of 7 years with the following exceptions:

- Training records are retained in perpetuity as verification of having completed your training.
- Job applications and CV's not pursued are deleted once a position has been filled
- Staff records, identification document and right to work verification documents are maintained for the duration of your employment plus a further 7 years once your employment has ceased.

## **9. Accuracy of your personal data**

We make every effort to maintain the accuracy and completeness of your personal information. However, you can assist us by contacting us if there are any changes to your personal information, or if you become aware that we have inaccurate personal information relating to you by using the contact details in our Policy Statement above. We will not be liable for any losses arising from inaccurate, inauthentic, deficient, or incomplete personal information that you, or a person acting on your behalf, provides to us.

If you believe that any information we are holding about you is incorrect or incomplete and require it to be amended, please contact us using the contact details in our Policy Statement above.

## **10. Your rights**

In any event, you have the following rights:

- Your right of access - you may request copies of your personal information.
- Your right to rectification -you may request that we rectify personal information you think is inaccurate or incomplete.
- Your right to erasure - you may request that we erase your personal information except where we are under a legal obligation to keep your data, in which case you may request a restriction of processing of your personal data.

- Your right to object to processing - you may object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interest
- Your right to data portability - this only applies to information you have given us. You may request that we transfer the information you gave us from one organisation to another or to give it to you. This right only applies if we are processing information based on your consent or under, or in talks about entering into a contract, and the processing is automated.

You can contact us at any time by using the contact details provided in the above Policy Statement regarding your rights. You can also tell us at any time to not send you marketing communications by email, by using the contact information in the Policy Statement, or by clicking on the unsubscribe link within the marketing emails you may receive from us.

## 11. Protecting your personal data

We are committed to ensuring that your information is secure. We have reasonable technology and organisational security measures in place to protect your personal information from unauthorised access, use, alteration and disclosure. We are pleased to be Cyber Essentials Plus certified (a UK Government backed scheme that helps to protect an organisation against a whole range of the most common cyber-attacks). Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk.

Once your personal information is received, it is managed in line with recognised industry security practices to safeguard it as best we can, but we cannot guarantee that the security measures we have in place will never be defeated or fail, or that such measures will always be sufficient or effective.

Please note:

- Your personal information will only be seen by those who have a legitimate reason for seeing it,
- Your personal data may be processed by staff operating outside the UK or the EEA who work for us, or for one of our sub-processors,
- Third parties who are authorised to access, store and manage our data sets (which include your personal information records) are bound by confidentiality agreements,
- Our website is assessed as PCI compliant.

**We do not collect, access, store or process any payment information on our websites.** The processing of payment transactions is carried out in a third-party secure Payment Gateway named Stripe. Discover more about Stripe on our sub processors list, or by reviewing their privacy policy.

## 12. Links to other websites and social media platforms

Our websites and other communications you receive from us may contain links to other websites of interest. If you use these links, please be aware that we do not have any control over that other website and therefore we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites. Such sites are not governed by this Privacy Policy. Please exercise caution and look at the privacy statement applicable to the website in question.

Your interactions with us on any of our social media platforms are governed by the privacy policies of the third-party platforms including but not limited to LinkedIn, YouTube, Vimeo, X and Vidyard. Please refer to their privacy policies before exploring their pages.

### 13. IP addresses

When you access our website, use any of our mobile applications, or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. We may use IP addresses for system administration, investigation of security issues, and compiling data regarding use of our website, including the completion of web-forms and downloads, and/or mobile applications.

### 14. Cookies - what they are and how we use them

Cookies on our websites (are used for a variety of different purposes, classified into the following categories:

- **Strictly necessary cookies:** these are required for the operation of the website. They include, for example, cookies that enable approved users to log into secure areas of the website.
- **Analytical/performance cookies:** we use Google Analytics to gain insight into how our website is used, analysing information on the most visited pages on our website, the geographical locations of our visitors, time spent on the website and the number of times a link has been clicked, amongst many other useful anonymous statistics. `_gat`, `_gid`, and `_ga` are enabled.
- **Functionality cookies:** these improve the functional performance of our website and make it easier for you to use. For example, such cookies are used to remember that you have previously visited the website and asked to remain logged in to it if you have a user account. Cookies are also used by `www.cmcpartnership.com` to protect the security of the site, for example by blocking multiple form submissions. In order to give the best possible browsing experience, we use session cookies to temporarily store data. Session cookies are used to keep track of your activity as you move from page to page through the website. Our session cookies do not collect any personal/traceable data about you and are automatically deleted when you close your browser.
- **Targeting Cookies:** these record your visits to our websites, identifying the webpages you have visited and the links you have followed.

### Removing and managing cookies

To ensure that you are in control of your privacy at all times, all web browsers give you the option to disable cookies. Most browsers are initially set up to accept HTTP cookies. For more information about HTTP cookies and how to disable them the following links may be helpful, or you can use the “Help” option in your browser which should tell you how to stop accepting new cookies.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web and iOS](#)

## 15. Useful links

If you would like to find out more about privacy, cookies and their use on the internet, you may find the following links useful:

- [Microsoft cookies guide](#)
- [All About Cookies](#)
- [UK Information Commissioner's Office](#)
  - Prosci UK Limited is registered as a data controller with the ICO (Registration number ZB725789).
- [EU GDPR Official Information](#)