

## PRIVACY POLICY

### 1. Purpose

Our Privacy Policy outlines what information we hold, how we use it, and how we protect it. We prioritise the protection of your privacy and encourage you to carefully review this policy to understand how we collect and use your personal information.

### 2. Who is responsible for your Data

We are the controller of the data which we collect from you, and as such we control the ways your personal data are collected and the purposes for which your personal data are used. We can be contacted Centaur House, Ancells Business Park, Ancells Road, Fleet, GU51 2UJ, a limited company registered in England & Wales (06000533) or via email [info@isbconsultancy.co.uk](mailto:info@isbconsultancy.co.uk)

### 3. What personal data we collect and why?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting the personal data of our business contacts. In each of the sections listed below, we describe how we obtain your personal data and how we will treat it.

### 4. Existing or Prospective Customers and Vendors

#### 4.1. Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly;
- b) from a company that employs you, or your colleague, if you are an employee of our customer or vendor;
- c) from other affiliates within the ISB CONSULTANCY LTD
- d) during networking events that we have either hosted, or sponsored, or attended;
- e) from publicly available sources (for example, your company website, or social media sites); and/or
- f) from other third party sources

#### 4.2. Personal data that we collect and process

We may collect the following categories of personal data relating to our corporate customers' or vendors' employees, officers, authorised signatories, and other associated individuals. This may include:

- a) name;
- b) salutation;
- e) email address;
- f) telephone number; and/or
- g) job title.

### 4.3. Why do we collect your personal data and what are our lawful bases for it?

Representatives of our Existing or Prospective Customers and Vendors		
We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide you with our products or services or receive products or services from you	Legitimate Interest	Efficiently fulfil our contractual and legal obligations Management Reporting (including at an affiliate level)
Establish and manage our relationship		Efficiently fulfil our contractual and legal obligations Account Management Exercise or defend legal claims Understand the market in which we operate Management Reporting (including at an affiliate level)
Learn about how our products and services are or may be used		Understand the market in which we operate Management Reporting (including at an affiliate level)
Security		Managing security, risk and crime prevention Management Reporting (including at an affiliate level)
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms of electronic communication		Promote our goods and services Management Reporting (including at an affiliate level)

If you object to us using your contact details for these purposes, including direct marketing, please send us an email us at [info@isbconsultancy.co.uk](mailto:info@isbconsultancy.co.uk)

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

## 5. Course Participants

5.1. We collect various types of personal data about Course Participants including:

- Name
- Contact Details (email address, phone number)
- Training Needs in relation to the Training Programme
- Course and examination booking
- Exam results

The purposes for collection and processing Course Participant Personal Data is outlined in the table below:

Categories of Personal Data	Purpose of Processing	Lawful Basis for Processing
Name  Contact information including email address, phone, and physical address  Demographic information (postcode, preferences and interests)  Training Needs	Contacting you regarding course content, instructors, schedules and other service messages	Legitimate interest (managing our relationship with you, to keep you informed about your course and changes in our policy; promoting and marketing,)
	Internal record keeping	Legitimate interest (record keeping and business planning)
	Improving our products and services	Legitimate Interest (business development and marketing, development of products and services)
	Providing you with promotional information on new ISB CONSULTANCY LTD, special offers and other information you may find interesting.	Legitimate Interest (marketing)

	Conducting participant surveys	Legitimate Interest (market analysis, management reporting, and feedback)
	Quality assurance, trend and statistical analysis	Legitimate Interest (forecasting, management reporting, and business analysis)
Name	Recording of training sessions as part of the educational service	Legitimate Interest (the use and benefit of the customer course attendees as well as course quality assessment)

5.2. In some cases, it may be necessary for ISB CONSULTANCY LTD to process Special Categories of Personal Data about Course Participants, for example, about an individual's disability or religion, in order to enable us to address their particular needs. ISB CONSULTANCY LTD will only process Special Categories of Personal Data about you with your explicit consent, and solely for this limited purpose.

5.3. When we record training sessions as part of delivering our educational services/ for the purpose of future use and benefit of our customer course attendees as well as course quality assessment, ISB CONSULTANCY LTD will notify the participants of the training session that the training session is to be recorded. Recordings are limited to internal ISB CONSULTANCY LTD use and access by the participants through their personal account on the learning management platform. Course participants will have the right to opt out of such recorded sessions.

## 6. Sources of personal data

We may obtain your personal data directly from you or from a company or organisation with which you are associated.

## 7. Website Visitors

### Sources of personal data

We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our websites, including but not limited to email mailing lists, interactive services, or requesting further services);
- b) from your device or browser; and/or
- c) if you contact us, we may keep a record of that correspondence.

Personal data that we collect and process

- a) name;
- b) username;
- c) email address
- f) cookie data (for more information please see our Cookie Notice);
- g) preferences regarding online marketing; and/or
- h) IP address

C - Why do we collect your personal data and what are our lawful bases for it?

Website Visitors		
We may use your personal data to:	Our lawful basis for doing	Our legitimate interests in doing so are:
Provide our website services to you	Legitimate Interest	Website Management Promote our goods and services Account Management
Establish and manage our relationship		Understand the market in which we operate Management Reporting (including at an affiliate level)
Learn about our website(s) users' browsing patterns and the performance of our		Website Management
Security		Managing security, risk and crime prevention Management Reporting (including at an affiliate level)
Let you know about our products, services and events that may be of interest to you by letter, telephone, email or other forms		Promote our goods and services Management Reporting (including at an affiliate level)
Learn about how our products or services may be used		Understand the market in which we operate Management Reporting (including at an affiliate level)

Where we use cookies or similar technologies to fulfil this purpose we will seek your prior consent where required to do so by law.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

## 8. Sharing of personal data

8.1. We may disclose your personal data to other affiliates of the ISB CONSULTANCY LTD

- (a) course facilitation;
- (b) general course attendee administration;
- (c) information security services and IT support;
- (d) storage of personal data ;
- (e) marketing campaigns .

8.2. We may also disclose personal data to trusted third parties, to enable them to:

- (a) provide us with platform and related access services;
- (b) provide virtual classrooms for remote trainees;
- (c) provide sandbox environments for trainees;
- (d) deliver courses provided by our trusted partners;
- (e) provide exam administration and certification services.
- (f) processing of payments
- (g) conducting and facilitating examinations/assessments

8.3. We may also use and disclose Personal Data that you provide us for other purposes if authorised by you.

## 9. How long we keep your personal data

ISB CONSULTANCY LTD only keeps the personal data for no longer than is necessary for the purposes for which the personal data are processed.

We will generally hold personal data collected for the purposes of complying with various legal obligations and regulations for the entire duration of our relationship with our Course Participants with regard to the provision of services and any applicable regulatory or retention period prescribed by law. We will retain information about you after your course has ended for as long as required for legal, regulatory, fraud prevention and legitimate business purposes.

## 10. Your rights

The GDPR provides you with certain rights in relation to the Processing of your Personal Data, including to:

- Request access to Personal Data about you (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you.

- Request rectification, correction, or updating to any of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to Process it. You also have the right to ask us to delete or remove Personal Data where you have exercised your right to object to Processing (see below).
- Request the restriction of Processing of your Personal Data. This enables you to ask us to suspend the Processing of Personal Data about you (e.g. if you want us to establish its accuracy or the reason for Processing it).
- Request the transfer of Personal Data provided by you (“data portability”).
- Object to the Processing of your Personal Data in certain circumstances.

The exercise of these rights is not absolute and may be subject to certain pre-conditions and exemptions under the GDPR. Should you wish to exercise the rights accorded by the GDPR, please contact our Privacy Officer.

Please address any requests to exercise your rights to the physical or email address specified.

## 9 Complaints

9.1 We strive to process your personal data in accordance with the applicable legal obligations but if you have any complaint(s) in that regard, please address your complaint(s) to our Privacy Officer.

9.2 You also have the right to lodge a complaint with the UK Information Commissioner’s Office (“**ICO**”) if you are not happy with how ISB CONSULTANCY LTD Processes your Personal Data and we cannot provide you with a satisfactory resolution to your request.

## 10 DEFINITION

10.1. The following terms used within this Notice are defined as follows:

10.2. “Course Participant” means an employee or independent contractor of a legal entity, corporation, or sole proprietor with which ISB CONSULTANCY LTD has a contract or anyone who participates in a course, coaching session including but not limited to testing or assessment;

10.3. “Data Controller” means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Data; where the purposes and means of Processing are determined by national or EU laws or regulations, the controller or the specific criteria for his nomination may be designated by national or EU law.

10.4. “Data Processor” means a natural or legal person, public authority, agency or any other body which processes Personal Data on behalf of the Data Controller.

10.5. “European Economic Area” or “EEA” means the Member States of the European Union, plus Norway, Iceland and Lichtenstein.

- 10.6. "GDPR" means the EU General Data Protection Regulation 2016/679 including national laws implementing or supplementing the GDPR.
- 10.7. "Personal Data" means any information relating to an identified or identifiable natural person (also referred to as 'Data Subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 10.8. "Special Categories of Personal Data" means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purposes of identifying an individual, data concerning health or data concerning a natural person's sex life or sexual orientation.
- 10.9. "Process" or "Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.