



CONSEPSYS LIMITED

## PRIVACY POLICY

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00-GV-N-001601-CSL-CPM-POL-100033

REVISION 00

| Rev. Index | Status & Reason for Issue | Revision Date | Author                  | Approver                    |
|------------|---------------------------|---------------|-------------------------|-----------------------------|
| 00         | IFU                       | 21-Jun-2019   | Luis Heng <i>L HENG</i> | Julie Tchao <i>J. Tchao</i> |
|            |                           |               |                         |                             |
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## 1. INTRODUCTION

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Consepsys Limited respects your right to privacy. Your privacy is extremely important to us and we are strongly committed to protecting personal data that we collect, that we use and that we hold.

This policy explains what personal information we collect, why we collect it and how we use it. The policy provides information about your rights regarding the privacy of your personal data and about other important topics relating to your privacy and data protection.

We take appropriate measures to protect your personal information. We continually endeavour to make sure that the information that we hold about you is accurate and up to date.

Consepsys Limited processes personal data for numerous purposes, and the means of collection, the lawful basis of processing, the use and the retention periods for each purpose may differ.

It is the policy of Consepsys Limited to comply with all applicable privacy and data protection laws. Our Privacy Policy and our privacy practices are designed to comply with the European General Data Protection Regulations (GDPR) and the UK Data Protection Act (DPA) that came into force in May 2018.

Our commitment regarding your privacy reflects the value that we place on earning and keeping the trust of our customers, business partners and others who share their personal information with us.

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## 2. CONTENTS OF OUR PRIVACY POLICY

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- Data controller and contact information
  - What information do we collect?
  - What we do not do with your data
  - Who has access to your data
  - When do we share personal data?
  - Where do we store and process personal data?
  - How long do we keep your personal data for?
  - Use of cookies and other technologies
  - Your rights in relation to personal data
  - Contact us
- 

## 3. DATA CONTROLLER AND CONTACT INFORMATION

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We are controllers for the personal data that we process.

We regularly review this Privacy Policy and we regularly assess our compliance with this Privacy Policy. If you have any questions about our privacy practices or the contents of this Privacy Policy, please feel free to contact:

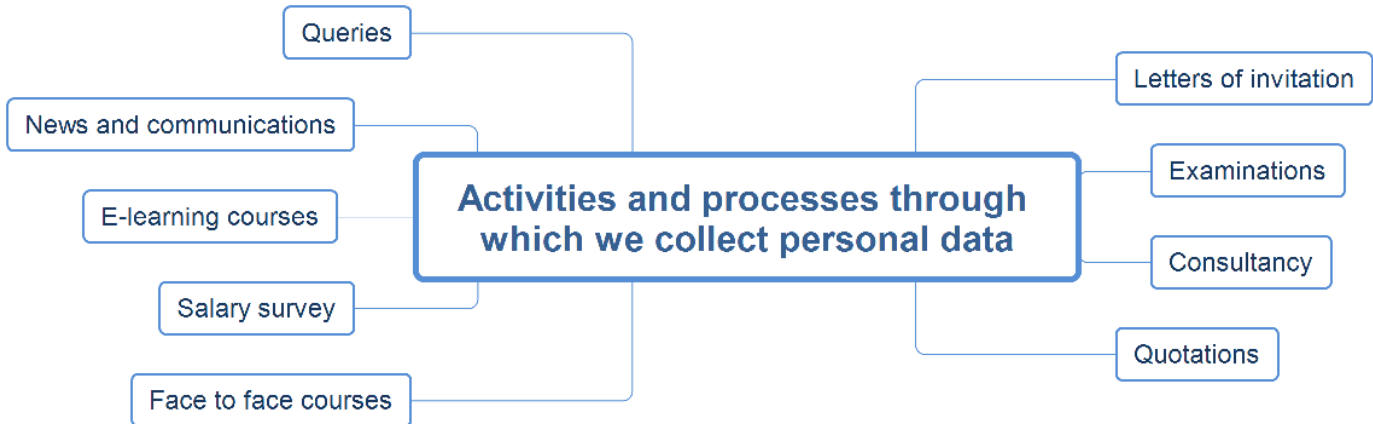
Data Protection officer

Email: [contact@consepsys.com](mailto:contact@consepsys.com)

## 4. WHAT INFORMATION DO WE COLLECT?

### 4.1. GENERAL

Consepsys Limited collects data for a number of reasons and through a variety of activities and processes, which are shown on the below figure.



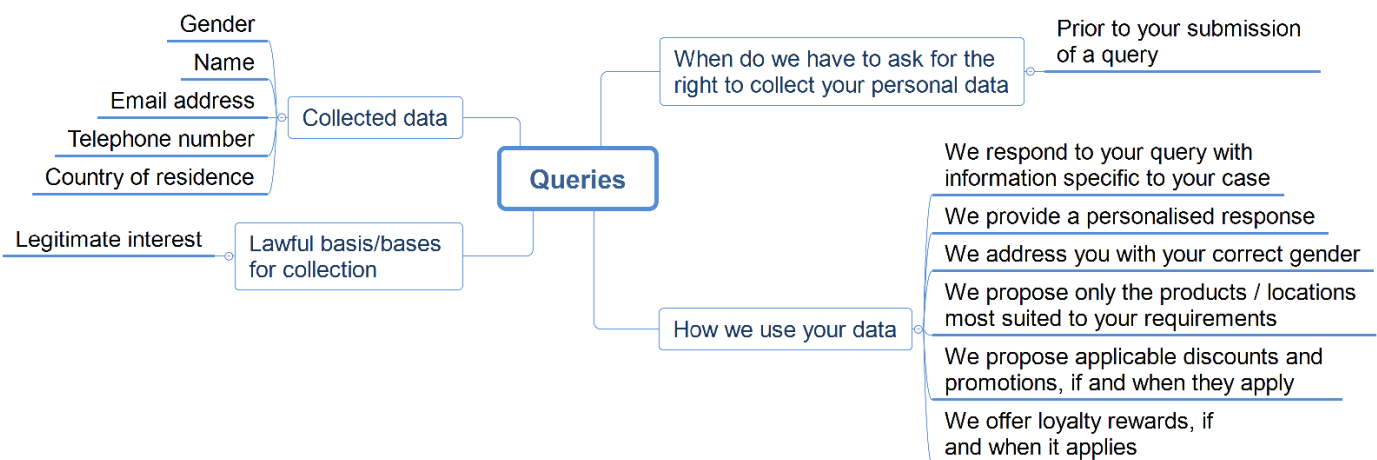
We also may use information about you for reasons not described in this Privacy Policy where the reason is compatible with the purpose for which we originally collected your information and where such use is lawful.

We may collect or receive information about you from other sources with which you interact (eg Facebook, LinkedIn etc) or companies that are our partners to update or supplement the information that you provide or that we collect automatically. We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

The details of personal data that we collect through each of these individual activities or processes are provided below.

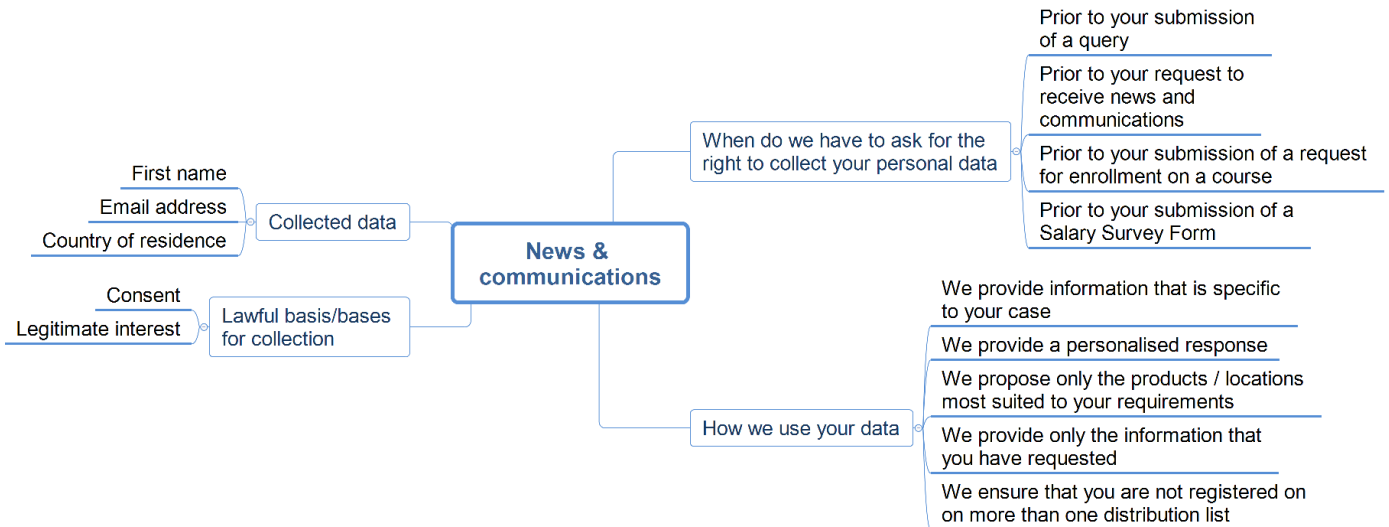
### 4.2. QUERIES

Consepsys Limited collects personal data through our query processes, as follows:



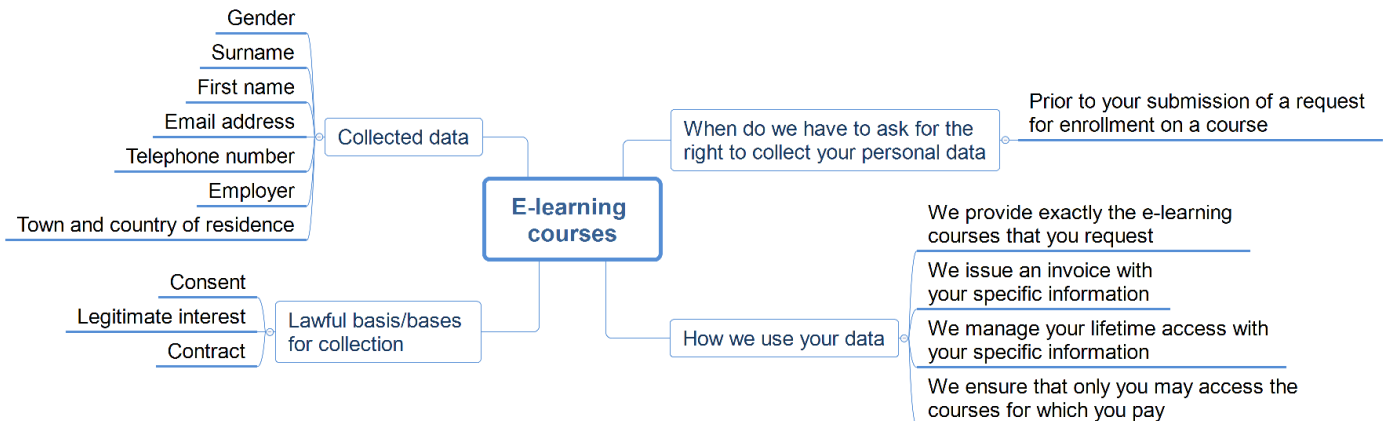
### 4.3. NEWS AND COMMUNICATIONS


Consepsys Limited collects personal data for the purpose of disseminating news, communications and material of interest, as follows:



### 4.4. E-LEARNING COURSES

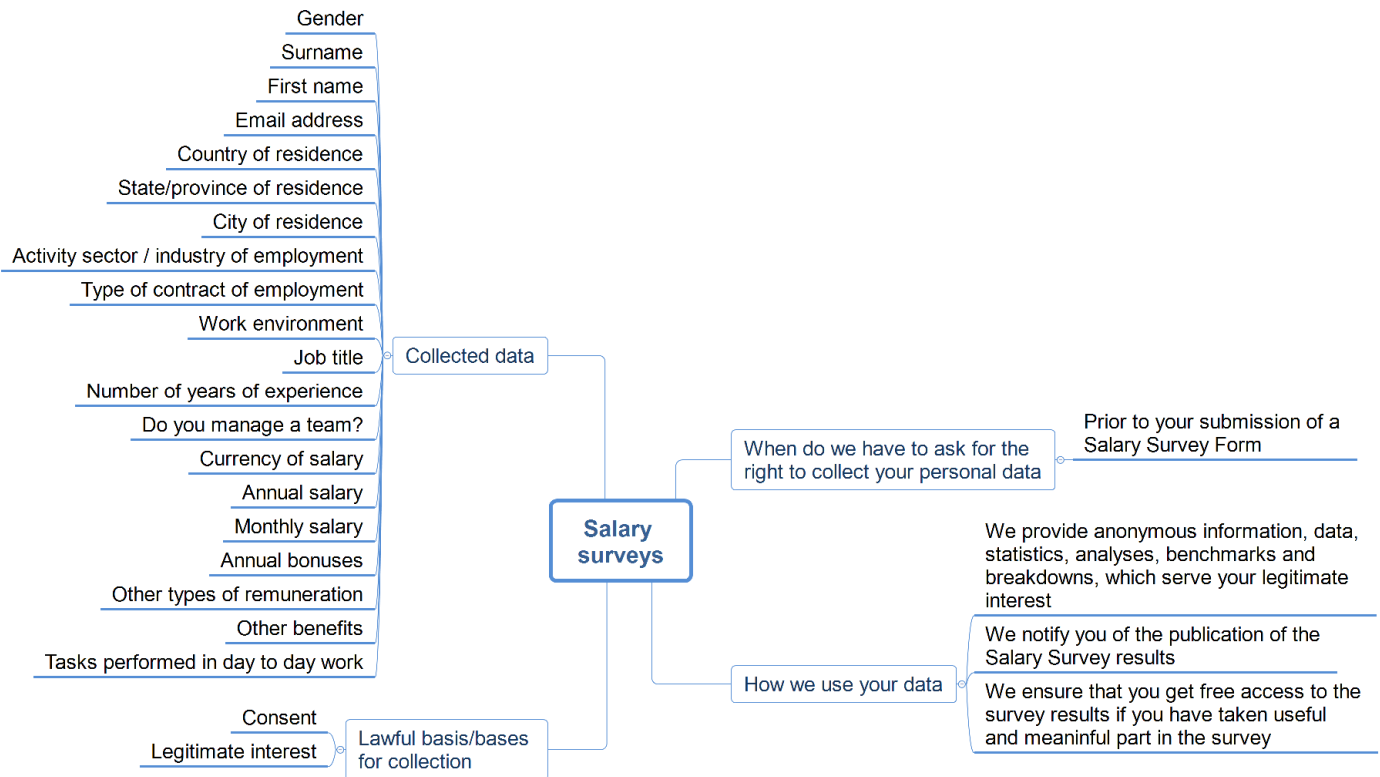
Consepsys Limited collects personal data when users register for online/e-learning courses, as follows:



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## 4.5. SALARY SURVEY

Consepsys Limited collects personal data for the purpose of producing salary surveys, as follows:

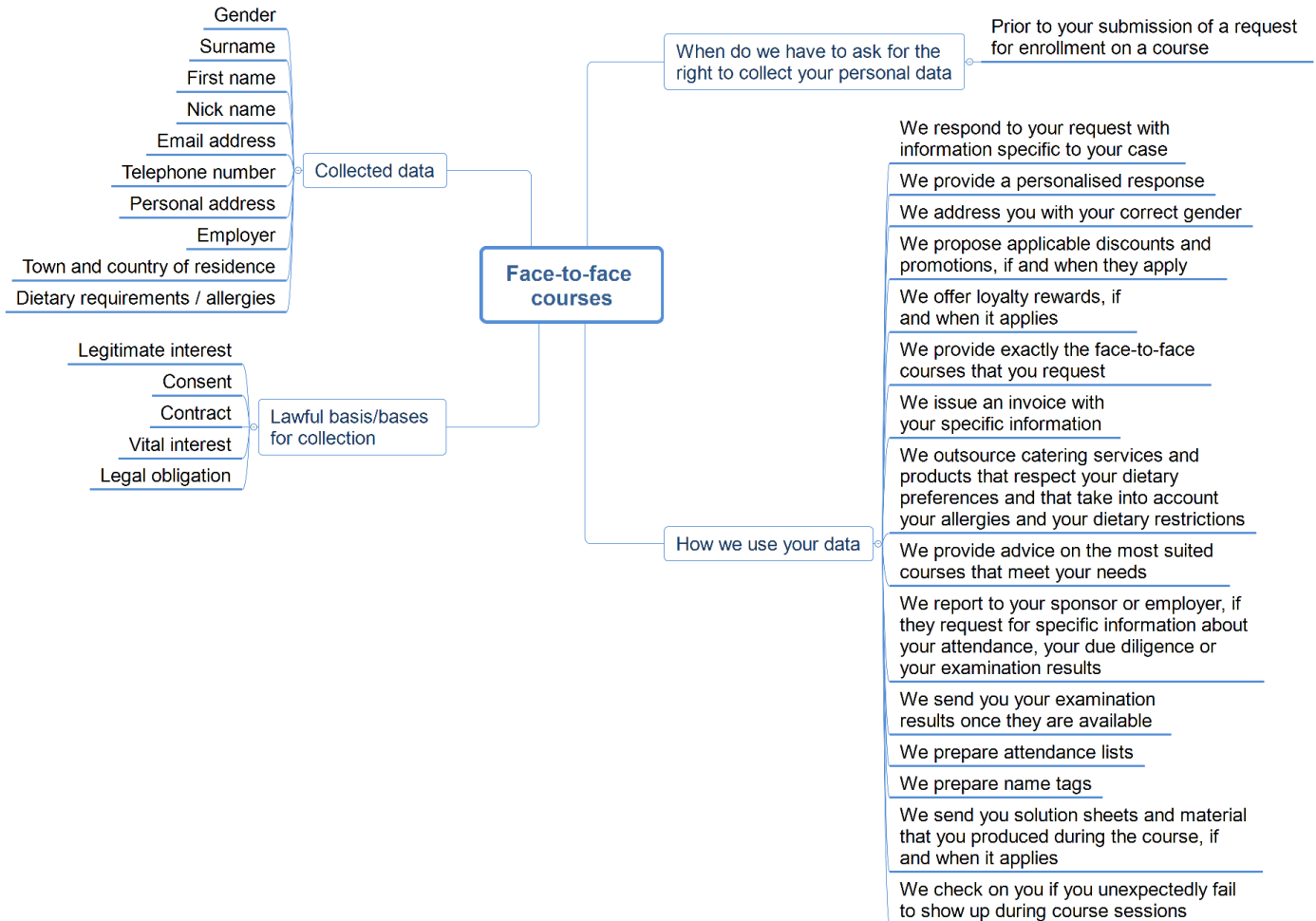





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## 4.6. FACE-TO-FACE COURSES

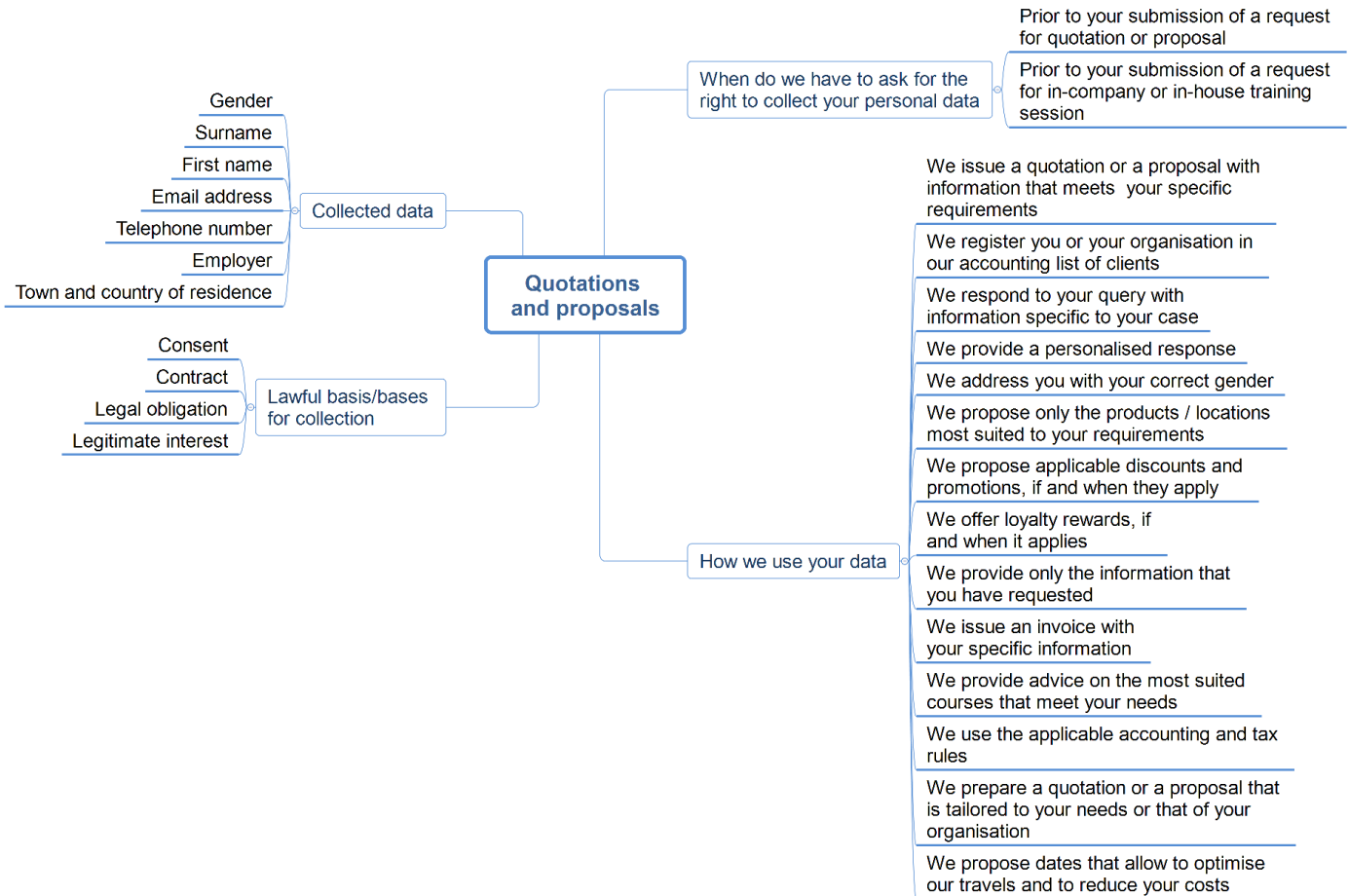
Consepsys Limited collects personal data when users register for face-to-face courses, as follows:



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## 4.7. QUOTATIONS AND PROPOSALS

Consepsys Limited collects personal data for the purpose of providing quotations and preparing proposals, as follows:



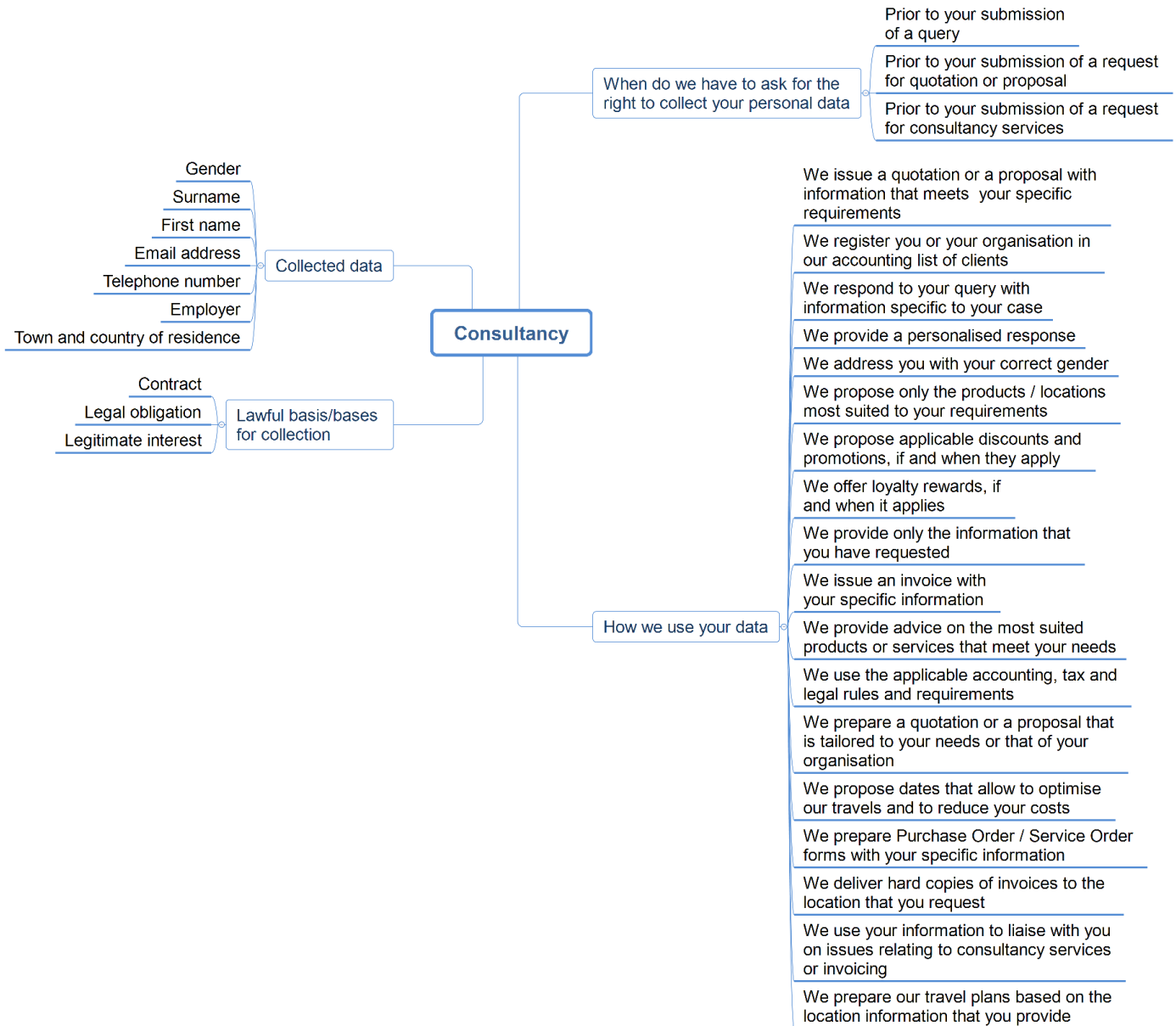




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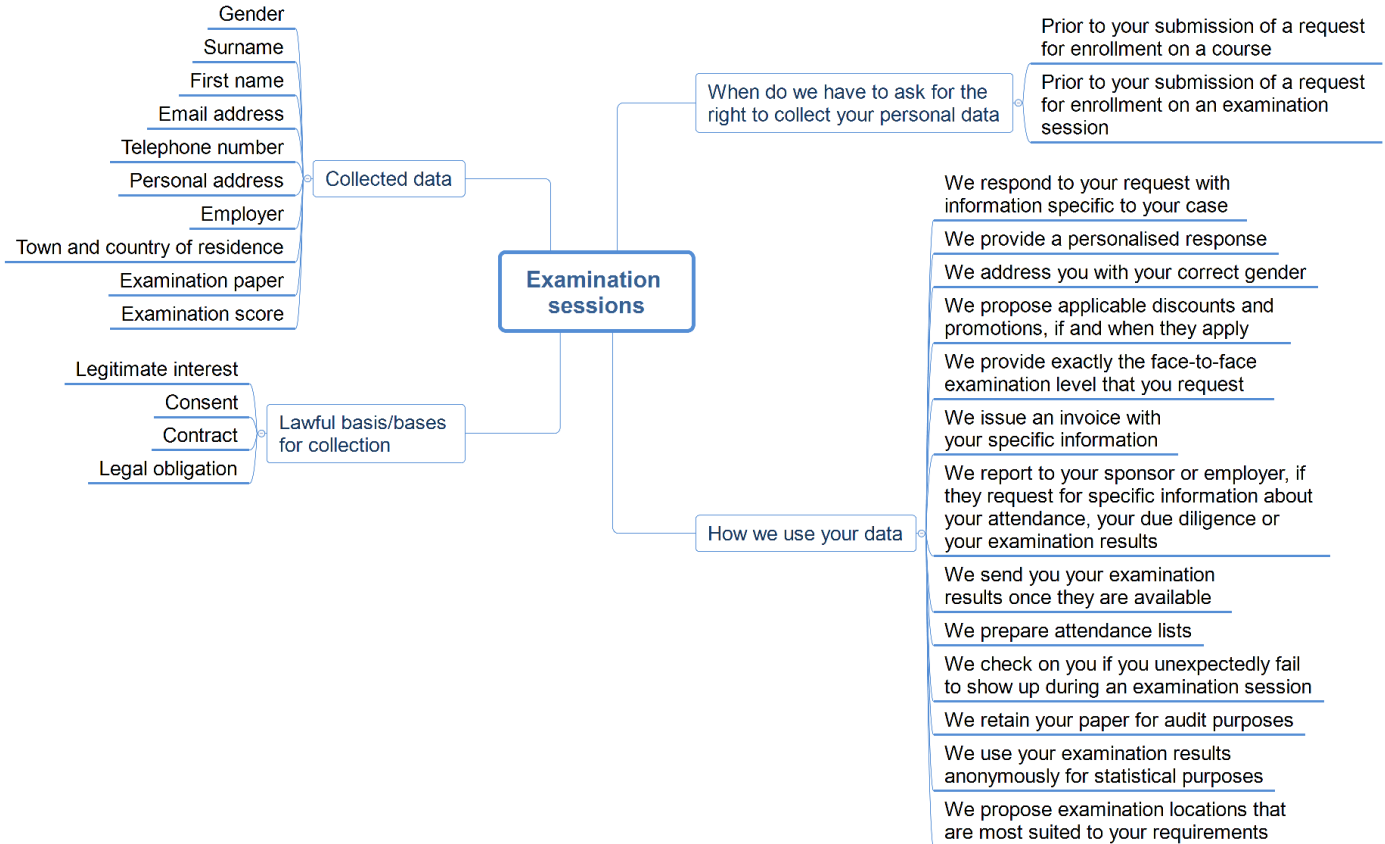
## 4.8. CONSULTANCY


Consepsys Limited collects personal data for the provision of consultancy services, as follows:



## 4.9. EXAMINATION SESSIONS

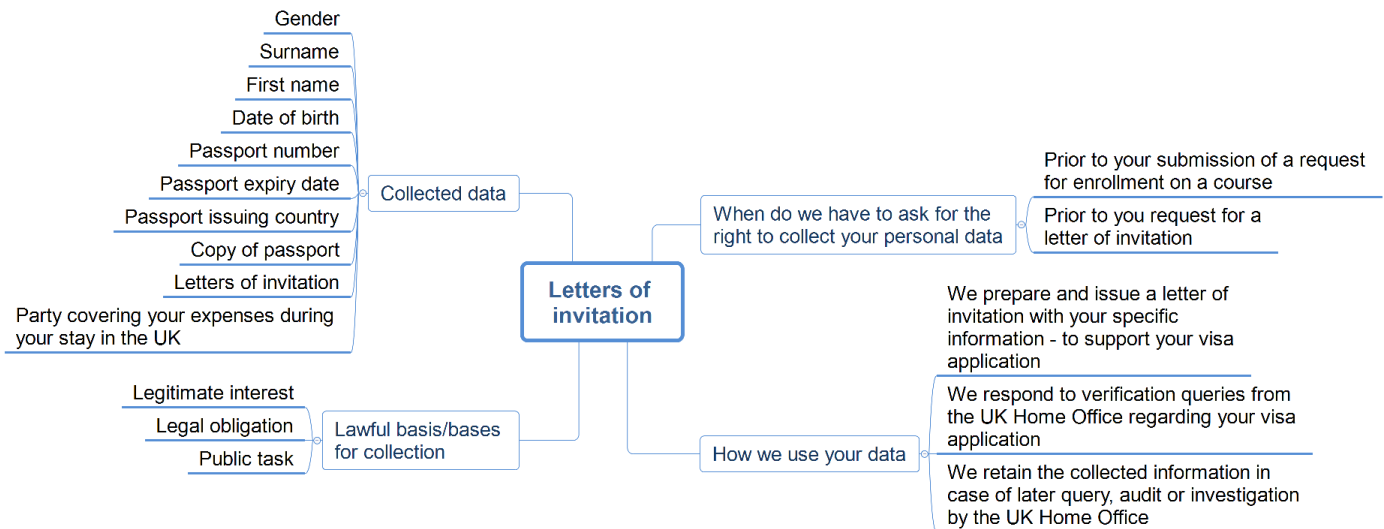
Consepsys Limited collects personal data when users register for examination sessions, as follows:



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## 4.10. LETTERS OF INVITATION

Consepsys Limited collects personal data for the purpose of issuing letters of invitation, as follows:



## 5. WHAT WE DO NOT DO WITH YOUR DATA


- We will not use your data for automated decision making;
- We will not use your data for profiling purposes;
- We will never sell your data;
- We will not share your data for any other purpose than that described above.
- We do not direct the Website to, nor do we knowingly collect any personal information from, children under 18.

## 6. WHO HAS ACCESS TO YOUR DATA

Only Consepsys Limited authorised personnel have access to your personal data.

## 7. WHEN DO WE SHARE PERSONAL DATA?

As a basis, Consepsys Limited never shares your personal data with any entities or individuals other than the authorised Consepsys personnel.

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The only exception to this principle is when the services or products that have been purchased on your behalf were sponsored by your employer or a government agency. In this case, we are obligated to provide information about you, upon request of your employer or the government agency that has sponsored you, fully or partially.

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## 8. WHERE DO WE STORE AND PROCESS PERSONAL DATA?

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We always strive to process your data within the EU/EEA.

For some of its activities, Consepsys Limited may use software packages, cloud-based programs and servers owned by companies based outside of EU/EEA.

We are committed to protecting the security of your information. We maintain what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure your information and to prevent unauthorised access, maintain accuracy, and ensure appropriate use of your information.

Consepsys Limited has implemented technological and operational security processes to protect your personally identifiable information from loss, misuse, alteration, or unintentional destruction.

The accuracy, safety, and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Websites, you are responsible for keeping this password confidential. We ask that you not share your password with anyone. Even though we do our best to protect your information, transmission of information via the internet is not completely secure, and we cannot guarantee our security measures. We are not responsible for any unauthorised access to or acquisition of your information.

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## 9. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

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We will retain your personal information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

There are certain reasons we have to keep hold of your information.

We keep information while you are our customer or after you have left us, but only as long as we need it for the purposes described above. How long we keep it depends very much on the type of information and purpose.

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## 10. USE OF COOKIES AND OTHER TECHNOLOGIES


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### 10.1. OUR USE OF COOKIES

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The Consepsys Limited website uses Google Analytics to help analyse how users use the site. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity for London Corporate Training.

Consepsys Limited will not use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our site. We will not associate any data gathered from this site with any personally identifying information from any source as part of our use of the Google statistical analytics tool. Google will not associate your IP address with any other data held by Google. Neither Consepsys Limited nor Google will link, or seek to link, an IP address with the identity of a computer user.

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## 10.2. IMPORTANT NOTE CONCERNING DATA PROCESSING IN CONNECTION WITH GOOGLE ANALYTICS

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the responsible body for the data processing that occurs via this website has their basis outside of the European Economic area and Switzerland, then the associated Google Analytics data processing is carried out by Google LLC. Google Ireland Limited and Google LLC. will hereinafter be referred to as "Google".

Google Analytics uses "cookies", which are text files saved on the site visitor's computer, to help the website analyze their use of the site. The information generated by the cookie (including the truncated IP address) about the use of the website will normally be transmitted to and stored by Google.

Google Analytics is used exclusively with the extension "\_anonymizelp ()" on this website. This extension ensures an anonymization of the IP address by truncation and excludes a direct personal reference. Via this extension Google truncates the site visitor's IP address within member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional situations will the site visitor's full IP address be transmitted to Google servers in the United States and truncated there. The IP address, that is provided by the site visitor's browser in using Google Analytics will not be merged by Google with other data from Google.

On behalf of the site operator, Google will use the information collected to evaluate the use of the website, to compile reports on website activity and to provide other website and internet related services to the site operator (Art. 6 (1)( f) GDPR). The legitimate interest in data processing lies in the optimization of this website, the analysis of the use of the website and the adaptation of the content. The interests of the users are adequately protected by the pseudonymization of their data.

Google LLC. has certified their compliance with the EU-U.S. Privacy Shield Framework and on that basis they provides a guarantee to comply with European data protection law. The data sent and linked to the Google Analytics cookies, e.g. user IDs or advertising IDs will be automatically deleted after 50 months. The deletion of data whose retention period has been reached is done automatically once a month.

The website visitor may refuse the use of cookies by selecting the appropriate settings in their browser. The website visitor can also prevent Google from collecting information (including their IP address) via cookies and processing this information by downloading this browser plugin and installing it: <http://tools.google.com/dlpage/gaoptout>

The website visitor can prevent data collection via Google Analytics on this website by clicking here. An "Opt-out Cookie" shall then be applied which shall prevent any future collection of the site visitors data when visiting this website.


Further information concerning data processing and use by Google, the settings and deactivation possibilities can be found in the Google Privacy Policy (<https://policies.google.com/privacy>) as well as in the Google Ads Settings (<https://adssettings.google.com/authenticated>).

## 10.3. RECAPTCHA

We use the reCAPTCHA service provided by Google Inc. (Google) to protect your submissions via internet submission forms on this site. This plugin checks if you are a person in order to prevent certain website functions from being (ab)used by spam bots (particularly comments). This plugin query includes the sending of the IP address and possibly other data required by Google for the Google reCAPTCHA service. For this purpose your input will be communicated to and used by Google. However, your IP address is previously truncated by Google within member states of the European Union or in other states which are party to the agreement on the European Economic Area and is, as such, anonymized. Only in exceptional cases is a full IP address transmitted to a Google server in the United States and truncated there. On behalf of the operator of this website, Google will use this information to evaluate your use of this service. The IP address provided by reCaptcha from your browser shall not be merged with any other data from Google.

This data collection is subject to the data protection regulations of Google (Google Inc.). For more information about Google's privacy policy, please visit: <https://policies.google.com/privacy?hl=en>

By using the reCAPTCHA service, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

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## 11. YOUR RIGHTS IN RELATION TO PERSONAL DATA

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If we have collected any of your personal data, then you have a number of rights. These are:

- To have confirmation of what data we hold on you and what we do with that data
- To have a copy of the data we hold provided to you free of charge
- The right to object to us using your information
- The right to correct the information we hold on you if it is factually incorrect
- Under certain circumstances you have the right to have your data erased
- You also have the right for your data to be transferred to another organisation in an electronic format.

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## 12. CONTACT US

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If you:

- Wish to know what information we hold on you
- Have any questions or comments about this Privacy Policy
- Wish to file a complaint

please contact:

Data Protection officer

Email: [contact@consepsys.com](mailto:contact@consepsys.com)