

ENTRIMA'S PRIVACY POLICY

Entrima has developed a privacy policy which meets the EU regulation GDPR. Entrima's Privacy Policy sets out how Entrima uses and protects any information provided by its clientele and/or students, either by visiting our website (www.entrima.org), or by off-taking our learning services. Entrima is committed to ensure that the privacy of its clientele and students is protected. Should Entrima ask client/student to provide certain information by which one can be identified, then one can be assured that it will only be used in accordance with this Privacy Policy, unless explicitly stated otherwise.

Entrima may change this policy from time to time by updating this document; periodic reviews by clientele/students are therefore suggested. The latest version of this Privacy Policy will be posted on Entrima's website. If Entrima materially changes the ways in which it uses or shares personal information previously collected from clientele/students through our services, Entrima will notify students through our services, by email, or other communication.

Entrima collects personal data from the moment one leaves personal details on Entrima's website (<https://www.entrima.org>), one registers for the off-take of an Entrima learning service, or one registers in another way (e.g. via telephone, e-mail or a form (subscription, contact details)).

THE INFORMATION ENTRIMA COLLECTS

Entrima collects the following data:

- **Information from students**
 - (Account) registration: when one registers for an educational programme (online or onsite) (e.g. learning platform, simulation platform), Entrima asks for one's personal contact information, namely full name and email address (e.g. required for account creation and maintenance).
 - Entrima also records the Courses one has followed and the corresponding progress/activity (this is used to verify whether someone has been certified, as well as for reporting client about proceedings). However, in case of Entrima's Trading Simulations, proceedings are not tracked at all and, thus, not stored.
 - Next, in case of classroom training, Entrima records correspondence and forms, such as emails, list of course participants/attendees, evaluation forms, exam (answers, results) and certificates.
 - Entrima collects messages, images, video, audio, and files submitted by learners to its company app (for mobile devices), and the related communities (chatrooms).
- **Information from clients**
 - From clients Entrima collects the following information: company name, VAT number, address, contact person, email address contact person, telephone number, staff (student) information.
 - Entrima also records correspondence and forms, such as emails, offers, orders, invoices, contact forms, student lists, reports (activity / progress students).
- **Payment Information**
 - When client adds its financial account information to one's account, that information is directed to Entrima's third-party payment processor. Entrima does not store client financial account information in its systems.

- Entrima stores client/student data depending on the applicable statutory retention periods, one's privacy rights and the legitimate interest in the context of Entrima's business operations and services. In the meantime Entrima will keep the provided information until one requires Entrima to delete it.

▪ **Cookies**

Only third-party cookies are used on Entrima's website, to improve the service, i.e. Google Analytics and Youtube video player. These functions use anonymised cookies: more technical details about their behaviour are in the following description.

Google Analytics

- Our website uses a cookie from the US company Google as part of its Google Analytics service. We use this service in order to monitor anonymous how our visitors use our website. Google may provide this information to third parties if Google is legally required to do so or if the third party is responsible for processing the information on the behalf of Google. Entrima has no influence on such provision. We have not given permission to Google to use the analytics information provided for any other Google services. The information collected by Google is made as anonymous as possible. The information is stored on Google servers in the United States. Google adheres to the Safe Harbor principles and has joined the American Department of Commerce's Safe Harbor programme. Among other issues, this guarantees a sufficient level of protection for the processing of any personal data present.
- More information: <https://policies.google.com/privacy>
- To opt-out of being tracked by Google Analytics across all websites: <https://tools.google.com/dlpage/gaoptout>

gtag.js and analytics.js set the following cookies:

Cookie Name	Expiration Time	Description
_ga	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gid	24 hours	Registers a unique ID that is used to generate statistical data on how the visitor uses the website in an anonymous form.
_gat	1 minute	Used by Google Analytics to throttle request rate to limit the collection of data on high traffic sites.

Youtube

- On our website we embed Youtube video's from our official Youtube channel. The Youtube videos have privacy-enhanced mode enabled. This mode may only set cookies once one click on the Youtube video player. Youtube will not store

personally-identifiable cookie information. As cookies are set by Youtube, we have no direct control over this usage.

- o More information: [Youtube's embedding videos information page](#) and [Youtube's privacy policy](#)

DATA PROTECTION RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

If one is a resident of the EEA, one has the following data protection rights:

- If one wishes to access, correct, update, or request deletion of one's personal information, one can do so at any time by emailing Entrima via info@entrima.org.
- In addition, one can object to the processing of personal information, ask Entrima to restrict the processing of one's personal information, or request portability of one's personal information. One can do so at any time by emailing Entrima via info@entrima.org.
- One has the right to opt-out of marketing communications which Entrima emails at any time. One can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails. To opt-out of other forms of marketing, one is advised to contact Entrima via info@entrima.org.
- Similarly, if Entrima has collected and processed one's personal information with one's consent, then one can withdraw this consent at any time. Withdrawing this consent will not affect the lawfulness of any processing Entrima conducted prior to the withdrawal, nor will it affect the processing of one's personal information conducted in reliance on lawful processing grounds other than consent.
- One has the right to complain to a data protection authority about Entrima's data collection and use of personal information. For more information, it is advised to contact the relevant local data protection authority.

Entrima responds to all requests it receives from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Upon such a desire, one is expected to send an email to info@entrima.org.

HOW ENTRIMA USES INFORMATION

Entrima requires personal data specifically to certify students upon passing an exam (or providing a proof of participation upon request, after having attended a classroom training without examination).

Entrima requires personal data in general for the following reasons:

- Internal record keeping;
- Prevent fraud;
- Communicate with clientele/students to provide them with updates and other information relating to Entrima's services, as well as for marketing and promotional purposes;
- Send messages and push notifications;
- Informing employer (Entrima client) about the progress of their staff (Entrima's students).
- Display content submitted by the Learner in the company app (for mobile devices) to other Learners in the related communities (chatrooms).



Entrima will not sell or distribute personal data to third parties unless it has one's written permission or is required to do so by law.

SUBCONTRACTOR

Entrima has stored her data with subcontractors (data storage processors, salary processor). In these cases, Entrima has entered a processor's agreement with the relevant subcontractors. In accordance with the GDPR, these subcontractors have also taken the necessary legal measures to prevent security incidents and data leaks. In the exceptional case of a security breach and / or data breach, Entrima will act in accordance with the GDPR.

However, Entrima may share your personal data with other Entrima entities, its clients, its subcontractors (e.g. data storage processors) that provide services on behalf of Entrima that are relevant to the processing process and in cases in which Entrima is legally obliged to do so.

If one like to receive more information about Entrima's subcontractors, then please don't hesitate to contact Entrima via info@entrima.org.

THIRD-PARTY SERVICES

One may access other third-party services through the services, for example by clicking on links to those third-party services from within the services (for example payment transfers). Entrima is not responsible for the privacy policies and/or practices of these third-party services, and it encourages students/clients to carefully review their privacy policies.

SECURITY

Entrima is committed to protect personal information. To do so, it employs security measures designed to protect information from unauthorized access, use, or disclosure. The measures Entrima uses are designed to provide a level of security appropriate to the risk of processing one's personal information. However, it must be noted that the Internet cannot be guaranteed to be 100% secure.

ACCEPTANCE

Upon provision of personal data to Entrima, one accepts Entrima's Privacy Policy.

CONTACT

If one has any questions or concerns about this Privacy Policy, please feel free to email Entrima at info@entrima.org.