

## 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](http://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), Entrima asks for one's personal contact information, such as full name, date of birth, gender, nationality, employer, email address, telephone number and job title.
  - Entrima also records the programmes 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).
  - Next, Entrima records correspondence and forms, such as emails, list of course participants/attendees, evaluation forms, contact forms, exam (answers, results) and certificates.
- **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 tracking cookies are used on Entrima's website. To log in and update data, a session cookie is used for effectiveness and the quality of the website. These "cookies" do not infringe one's privacy.

Note: Learn more at <https://www.aboutcookies.org/>.

## **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](mailto: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](mailto: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](mailto: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](mailto: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;
- Use the information to improve products, services and communication;
- Prevent fraud;
- Develop new products, services, features, and functionality;
- 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).



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](mailto: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 protecting 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](mailto:info@entrima.org).