

# CUSTOMER DATA PRIVACY POLICY

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Dear Customer,

A new data privacy law, the **General Data Protection Regulation (GDPR)**, was introduced on 25<sup>th</sup> May 2018. It is relevant to any organisation that has dealings with the data of persons in the European Economic Area (EEA). As a result, we are publishing a new ***Customer Data Privacy Policy*** to make it easier for you to find out how Certification Europe uses and protects your personal data. The Privacy Notice provides additional information about what we do and sets out your rights in line with the General Data Protection Regulation including information such as:

- **Your increased rights in relation to the information we hold about you**
- **The legal basis on which we collect data about you, how we collect it and use it**
- **How long we retain your data**

The Privacy Policy will apply to any services we provide to you and is effective from **25 May 2018**. It ensures we continue to comply with privacy law and regulation. There are no changes to your terms and conditions. If we make changes to these, we will let you know.

### 1. INTRODUCTION

Certification Europe takes your privacy very seriously. This Privacy Policy is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact: [marketing@certificationeurope.com](mailto:marketing@certificationeurope.com)

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### 2. INFORMATION WE COLLECT ABOUT YOU

2.1 We collect personal data from you for one or more of the following purposes:

- To provide you with information that you have requested or which we think may be of relevance to a subject for which you have demonstrated an interest;
- To engage and complete commercial transactions with you, or the entity that you represent, for the purchase of or services from us;
- To fulfil a contract that we have entered into with you or with the entity that you represent;
- To ensure the security and safe operation of our websites and business infrastructure, and
- To manage all communications between you and us.

2.2 We also collect information you submit to us, "Submitted Information": This is information you give us about you by filling in forms on our website, or by corresponding with us (e.g. by e-mail). It includes information you provide when

you apply to Certification Europe, register for any of our services, enter into any transaction, and information provided to facilitate our service delivery. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, it may include financial details of your bank account, or the entity that you represent, including the bank account number, bank sort code, IBAN, details of your debit and credit cards.

2.2 We also collect information about your interaction with our website “Technical Information”, this may include information we collect about you and your device. Each time you visit our Site we will automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and your mobile operating system;
- information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, and messages sent or received with the payment;
- location Information. We use your IP address to determine your location
- information to help us deliver our service to you. We work closely with third parties in order to help us deliver our Site and on-line services to you. These third parties are business partners such as analytics providers and search information providers, and developers. Please see the 'Disclosure of your Information' section for more information.

### 3. USES MADE OF THE INFORMATION

3.1 Below is a summary of the key types of data that we make use of as part of the Certification Europe Services. For more information on how these types of data are used and for which purposes then please see the table below.

We use information held about you in the following ways:

- Submitted Information: We will use this information:
  - to deliver the services that you have requested from us; for example, audits/assessments, inspections, and training;
  - to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you with information about services we feel may interest you.
  - to verify your identity, to protect against fraud, and to comply with accreditation requirements;
  - to notify you about changes to our service; and
  - to ensure that content from our site is presented in the most effective manner for you and for your computers

- Information about your visit to our site: We will use this information:
  - to administer our Site for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our Site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our Site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our Site about services that may interest you or them;
  - to verify your identity, protect against fraud, and comply with accreditation requirements; and
  - to comply with our regulatory obligations.

### 3.2 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we use your personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose	Category of data	Type of data collected	Purpose for collection	Lawful basis for processing	Retention period
1. To provide you with information	Contact information	Name, company name, geographic location, email address, business sector.	To provide appropriate online or email information about you or the entity you represent	Fulfilling contracted service	Maximum 5 years from the data the information is collected.
			To deliver the services that you have requested and/or contracted from us	Legitimate business interest	5 years after the termination of any contracted service.

		Telephone number	Follow-up on requested information and identify further requirements	Legitimate business interest	
		Personal contact information as provided through website forms or at trade shows or any other means.	General mailing list subscription	Consent	
2. Financial information	Transaction details	Name, company name, geographic location, email address, business sector.	To conduct transactions for services with clients, and to ensure any transaction issues can be dealt with.	Fulfilling contracted service	5 years from the date of the termination of the contract.
			For accounting and taxation purposes	Legal obligation	
			Documentation should any contractual legal claim arise	Legitimate business interest	
	Payment card data	Primary account number (PAN), cardholder name, service code, expiration date	To conduct transactions for services with clients, and to ensure any transaction issues can be dealt with.	Fulfilling contracted service	Retained until authorisation approved.

3. Technical information	Security & technical performance	Technical information, as described above	To protect our websites and assess the performance of our infrastructure.	Legitimate business interest	5 years
5. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate business interest	Relevant statutory requirements

### 3.3 What do we mean when we say:

**Legitimate Interest:** this means the interest of ours as a business in conducting and managing Certification Europe Ltd to enable us to provide to you with relevant services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Fulfilling a Contracted Service:** this means processing your data where it is necessary for the performance of an agreed service to which you are a party or to take steps at your request before entering into such a contract.

**Our Legal Obligation:** this means processing your personal data where it is necessary for compliance with a legal, regulatory or accreditation obligation that we are subject to.

## 4. MARKETING

We want to make it crystal clear how we use your data for marketing purposes and how you can 'opt-out' from receiving any marketing communications from us whenever you want.

### PROMOTIONAL OFFERS FROM US

4.1 We may use your personal data (such as your Submitted Information) to form a view on what we think you may want, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have signed up to and/or use Certification Europe's services and, in each case, you have not opted out of receiving marketing notifications.

### THIRD-PARTY MARKETING

4.2 We will obtain your express opt-in consent before we share your personal data with any company outside the Certification Europe group of companies for marketing or promotional purposes.

### OPTING OUT

4.3 You can ask us to stop sending you marketing messages at any time by contacting [sales@certificationeurope.com](mailto:sales@certificationeurope.com) or by following the unsubscribe links on any marketing message sent to you.

## 5. DISCLOSURE OF YOUR INFORMATION

### DATA PROCESSING PARTNERS

5.1 We will disclose the data we collect from you derived from the delivery of our services or about visits to our website(s) to certain third parties who use personal data in delivering their services to us. They use data securely and confidentially and under strict contractual controls in accordance with data protection laws.

5.2 We send personal data to the following sets of data processors in order to deliver Certification Europe's services:

- Accreditation Bodies
  - This is in order to satisfy our accreditation requirements and compliance with international standards associated with the delivery of our services as an accredited certification and/or inspection body;
- Cloud storage providers
  - This is in order to safely and securely store your data with Certification Europe;
- Banking and financial services partners
  - Financial services providers that help us facilitate financial transactions with Certification Europe including banking partners, banking intermediaries and international payments services providers;
- Advertisers and analytics providers
  - We use analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Companies within the Certification Europe group
  - In order to provide a unified service across all of our services, we may disclose your personal information to any member of the Certification Europe group, which means any of our subsidiaries or related entities. Companies in the Certification Europe group will be acting as joint controllers or processors in order to provide the Certification Europe services.

5.3 We may also disclose your personal information in the following circumstances:

- If Certification Europe, or substantially all of its assets, are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

- In order to:
  - enforce or apply the General Terms of Service and/or the Business Terms and/or any other agreements between you and us or to investigate potential breaches; or
  - (ii) protect the rights, property or safety of Certification Europe, our customers or others. This includes exchanging information with other companies and organisations for the purposes of potential legal action or regulatory compliance.

## 6. STORAGE SECURITY & INTERNATIONAL TRANSFERS

6.1 The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (EEA). As we provide an international service your data may be processed outside of the EEA in order for us to fulfil our contract with you to provide our services. We will need to process your personal data in order for us, for example, to action a request made by you to execute an international payment.

6.2 Unfortunately, the transmission of information via the internet is not completely secure. 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.

## 7. YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. If you require this, then please reach out to our support team and contact [info@certificationeurope.com](mailto:info@certificationeurope.com) or contact us +353 1 6429300.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team at [info@certificationeurope.com](mailto:info@certificationeurope.com) or contact us +353 1 6429300.

Request erasure of your 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 your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. Certification Europe is under certain obligations to process and retain

certain data for compliance purposes. If you object to the processing of certain data then we may not be able to continue to provide the Certification Europe's services.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that a request in relation to the restriction of the processing of your data may mean that we are unable to continue to provide Certification Europe services to you.

Request the transfer of your personal data to you. We will provide to you, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide Certification Europe's services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## WHAT WE MAY NEED FROM YOU

7.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

7.2 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

7.3 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to terminate Certification Europe's services with you.

## 8. CHANGES TO PRIVACY POLICY

8.1 Any changes we may make to our privacy policy in the future will be posted on this page.